

# **SONI Evaluative Performance Framework**

## **Evaluation Report to UR of the EPF Expert Panel**

### **Assessment of SONI Forward Work Plan**

#### **1 October 2025 to 30 September 2026**

#### **Preamble**

Throughout this report, the following abbreviations are used:

UR is the Utility Regulator in Northern Ireland

EPF stands for Evaluative Performance Framework

SONI is the electricity transmission System Operator for Northern Ireland

TSO stands for Transmission System Operator

DSO stands for Distribution System Operator

NIEN stands for Northern Ireland Electricity Networks

SEMC stands for Single Electricity Market Committee

#### **Introduction**

As part of the 2020 to 2025 SONI price control, (since extended to 2026) the UR introduced the EPF, the primary purpose of which is to provide financial and reputational incentives to SONI to encourage it to engage in actions and behaviours which contribute to four high level outcomes.

One element of the EPF is the Expert Panel, established to bring independent expertise to the assessment of SONI's planned and actual performance.

The Panel's function is to undertake an evaluation of, and report on, SONI's Forward Work Plan (the Plan) and, subsequently, SONI's performance against this Plan.

The Panel's instructions are to assess the material in the Plan, and to take into account submissions provided by SONI's stakeholders in making its report to UR.

UR has provided detailed guidance\* to support and guide the Panel in its work.

UR is the decision-making authority.

This cycle of the EPF process relates to the regulatory period 1 October 2025 to 30 September 2026.

\*<https://www.uregni.gov.uk/publications/evaluative-performance-framework-guidance-document>

## Panel Assessment Process

### Review of Forward Work Plan

The Panel followed the detailed guidance issued by UR in reviewing and evaluating the Forward Work Plan.

This involved applying the following criteria:

- Service Ambition
- UR Service Priority Alignment
- Stakeholder Engagement
- Service Accountability

to the assessment of the actions and behaviours that the Plan presents as contributing to four high-level Outcomes:

- Decarbonisation
- Grid security
- System-wide costs
- SONI service quality

in each of the four SONI roles:

- System Operation and Adequacy
- Independent Expert
- System Planning
- Commercial Interface.

### Review of Submissions by Stakeholders on the Plan

SONI published the FWP 25-26 on 3 October 2025 and this was followed by a period of consultation closing on 7 November 2025, during which UR sought written submissions. Two written submissions were received and considered by the panel as part of their assessment process. In addition, the panel submitted clarification questions to SONI during their assessment, to which SONI provided written answers with further discussion on the day of the Stakeholder Meeting. SONI also undertook to provide additional clarifications post the Stakeholder meeting.

### Participation in meetings with stakeholders on the Plan

The Panel participated in a Stakeholder Meeting hosted by UR, attended by stakeholders/stakeholder representative groups, held (in person and virtually) on 18 November 2025. Representatives from the Board of SONI were also present.

During the first (open) part of this meeting, SONI made several presentations and stakeholders were then invited to make comments and ask questions of SONI. In the second (closed) part, attended by SONI, SONI Board members, UR and the Panel,

SONI provided additional, commercially sensitive, in depth presentations to illustrate how they had addressed challenges in several areas of the business successfully. These highlighted both developments in SONI's overall business operations and the detailed, tailored approach to specific issues of relevance to the EPF. These presentations were very helpful in adding to the Panel's knowledge of "real world" implementation. The Panel asked questions based on the Plan and the further information arising from both the open and closed sessions. SONI provided a clear and comprehensive response, further supported by additional follow up information post the meeting.

## **Review of Forward Work Plan – General Commentary**

### General Panel Commentary on Forward Work Plan

This is the fifth Forward Work Plan submitted under the EPF. The plan has evolved positively year on year in response to feedback from the EPF Panel, the UR and the efforts of SONI in taking on board constructive input from a range of sources. SONI has acknowledged the valuable input from stakeholders which has helped to shape their approach to both the Plan process and the Plan itself.

The Panel have previously noted that the constraints of the EPF Framework dictate to a great extent the way in which information in the FWP is presented.

This year SONI have adopted a different format for presentation of the Plan. This is a welcome step change and provides a more accessible route for stakeholders to:

- Understand the objectives and targets contained in the Plan
- Map the four High Level Outcomes contained within the EPF onto the contents of the Plan and;
- Understand how the new SONI Strategy underpins both SONI's longer and medium-term ambitions for the Plan

The use of lengthy Appendices has been discontinued and SONI should be commended for adapting the format of the Forward Plan to provide the required information in a single document with a reduced number of pages, compared to previous year's submissions. Given the necessary complexities and interactions inherent in the EPF Framework, the format used for this year's Plan is possibly approaching the "efficiency frontier" for presentation of information. However, the Panel look forward to any further innovations which SONI identifies for the next cycle.

The inclusion of a Foreword is a positive addition and provides the reader with an appreciation of how the newly developed SONI strategy underpins the general work of SONI and the FWP in particular.

The relationship between SONI's "full" business Plan and the FWP is now clearly stated, and a welcome development is that SONI have taken care to ensure "Business as Usual" activities are not conflated within the FWP.

The "Forward Work Plan Overview" is a useful addition to the Plan and could be expanded further into a full Executive Summary. The Panel have previously suggested the inclusion of an Executive Summary. It should provide the reader with the key takeaways from the Plan, why they are important and how they will be delivered. It may also direct the reader to the relevant sections so that those with limited time can optimise their engagement with the Plan.

The overall structure and content of the Plan is both consistent and coherent. It is evident that the document has been developed on a holistic basis, with links and cross dependencies clearly delineated. There is a good use of graphics throughout the Plan to illustrate complex issues. The relationship between the various SONI activities and the framework of the EPF is also clear. SONI should be commended for the approach taken to this iteration of the Plan format and content.

The FWP has a significant level of ambition, which is welcome. Ambition needs to be matched by adequate resources, clear but flexible plans and close management of operational delivery. From an external perspective, the Plan appears to be more resource intensive than previous years. The Panel assume that SONI have mapped the resource requirements onto the Plan work programme and identified any constraints and/or pinch points when committing to both the specifications for the individual projects; and their combined impacts and delivery timescales.

SONI have noted that its internal mechanisms for dynamic reprioritisation (where necessary) throughout the Plan delivery period have been enhanced. The impact and outcome of this will be a matter for the SONI End of Year Performance Report.

There is a satisfactory level of programme and project detail given throughout the Plan.

The Summary of SONI outcomes for each role is a welcome addition.

The Summary of Deliverables across the roles is also very helpful in summarising the contents of the FWP.

The infographic which provides a high-level overview of SONI projects across the year, is a welcome addition and provides a high-level view of delivery timelines and milestones. The Panel have noted over each Plan cycle that more could be done to provide stakeholders with a similar high-level overview of where multi-year projects are in their overall lifecycle, as there have previously been changes (or "rebasing") to timelines/milestones (for some projects) which have been difficult to assimilate without making reference to multiple documents.

The Panel note that the End Year Performance Report also has a significant role to play in the reporting of multi-year projects.

## Provision of Information

As noted above, this year's iteration of the Plan contains a great deal of information which has been effectively "distilled" in the document. The EPF process operates on information and evidence. The Panel have observed that on receipt of each Forward Plan, we have a number of clarificatory questions, which would be expected, given the scope and depth of the Plan. In each cycle SONI provide a full response to these questions and for this year have provided a significant amount of additional directly relevant and contextual information. The Stakeholder day presentations by SONI have also been highly valuable, focussed and illuminating and have allowed the Panel (and stakeholders) to have a fuller appreciation of the challenges contained in the FWP and the work that SONI is undertaking to meet them. The Panel also value greatly the input from wider Industry stakeholders regarding the content of the Forward Plan. This year there have only been two formal submissions by stakeholders into the evaluation process. The Panel have questioned what the underlying reasons might be for this level of engagement. SONI have suggested that their enhanced levels of engagement with stakeholders on a continuous basis and through new fora such as the Stakeholder Advisory Challenge Group (SACG) may have allowed stakeholders to contribute to the Plan development process at an earlier stage. If this is the case, it is a welcome development. However, given (some) of the concerns expressed in stakeholder submissions, it suggests that there is more work to do to fully integrate stakeholder input at an earlier stage.

Since the SACG is being further developed by SONI during the Plan period, it could potentially provide a valuable additional input directly to the EPF assessment process, either as a body or via its individual representatives.

It is worth reflecting that without these additional inputs to the "formal" evaluation process, the work of the Panel would be made more difficult.

## Strategy

This is the first Forward Plan which is underpinned by the new SONI Strategy. The Panel have previously suggested that the strategic context for SONI's work could be more clearly defined, along with the necessary relationships and responsibilities to deliver it.

Strategic goals should be clear and uncomplicated: "Secure, cleaner, cheaper energy" – meets this requirement well.

The role of the Strategy in "underpinning everything SONI does as the Northern Ireland TSO" is clearly spelt out and provides a longer-term backcloth against which individual Forward Plans can be seen (and evaluated) in context. The four strategic pillars are clear and relatable to SONI's activities and plans.

The mapping of all projects explicitly to SONI's four outcomes and strategic pillars is a significant positive development and assists both understanding and clarity.

The Panel note that as part of this package of work, the Stakeholder Advisory Challenge Group was set up, initially to assist in with the development of the SONI Strategy and the Price Control (SRP27) Business Plan. SONI have provided a detailed statement noting that the SACG were also provided with an opportunity for early review of the FWP 26/26; and outlining their ambition to develop the remit of the Group further. It was also noted that the focused stakeholder input provided by the SACG sits alongside its wider stakeholder and consumer engagement. This is a welcome development.

The Panel look forward to understanding the further beneficial input that the SACG has made to SONI processes in future reports.

## References

There remain references to other documents (e.g. TDPNI and SOEF) which require the reader to examine other publications to fully appreciate some of the points contained within the Forward Plan. This is probably unavoidable given the complexities and volume of work in the electricity "space". However, SONI should continue to reflect the fact that the Forward Plan should provide sufficient information (for its readers) by itself in order to fulfil its primary purpose.

## Stakeholder Engagement

As last year, the plan is complemented by the Stakeholder Engagement Strategy for 2024-26.

SONI continue to demonstrate a high level of commitment to stakeholder engagement and the steps in this Forward Plan represent a further evolution and expansion of that commitment. The embedding of the activity within the overall SONI Strategy through "Engagement, Partnership and Collaboration" is welcome, as is the recognition that working closely with government, industry, regulatory partners and civic society is fundamental to delivery.

The detail provided on the principles of engagement, tailored approach, delivery and measurement (along with specific case studies) provides a high degree of confidence that SONI's stakeholder engagement forms a core part of their activities. The assurance that stakeholder engagement and management is now comprehensively and centrally tracked within SONI is very welcome.

The commitment to report on progress and delivery against the Annual Stakeholder Engagement Action Plans through a published Annual Engagement Evaluation Framework is also very welcome.

The Panel note that SONI is now developing its new Stakeholder Strategy 2027-2032, in conjunction with stakeholders using the experience and lessons learned from its work to date. The Panel have previously noted that additional opportunities should be taken to incorporate operational “learning” into the process.

The one issue the Panel have identified is with SONI’s “evolving KPI - Stakeholder Satisfaction”; which is to maintain or exceed a baseline score of 60%. The justification for this lacks the necessary robustness and should be reviewed. SONI have noted that more work will be done as the metric “evolves”, including comparisons with not only peer groups within the electricity Industry but wider comparable entities. The Panel have confidence this will be addressed.

A key stakeholder relationship for SONI is that with NIE Networks. The Forward Work Plan seeks to build on the establishment and operation of the Joint Project Management Office (FWP 25-08) along with FWP 26-12 – Transmission Development Plan 2025; FWP 26-11 - TSSPS Review; FWP 25-04 - Transmission Clusters (to name but a few). The JPMO project description embodies a step change in SONI’s expectations for the future of this collaboration and encompasses detailed descriptions of processes, accountabilities and reporting mechanisms to achieve its objectives. The Panel looks forward to future input from other stakeholders on its operation and outcomes.

### Cost Scale (and Graphics)

The continued (and enhanced) use of a cost scale is helpful. Care should be taken such that the colour coding of the cost scale and the general use of colour to differentiate projects are not conflated.

The use of graphics and colour is generally excellent. However, care should be taken to ensure that “general” symbols cannot be misinterpreted as “specific” ones. An example is the use of a “£” symbol as a descriptor for “Quarter Four” in the Quarterly Deliverables graphics.

### Deliverables

General Overview Section: The overview of the grouping of deliverables (projects) by role, page reference and SONI outcome is clear and provides the reader with a concise overview. Our comments with regard to incorporating this into an umbrella section as part of an Executive Summary also apply.

Individual Roles - Projects delivered under each role: The format used - Project description: Overview; Deliverables; Alignment to SONI Strategy; Mapping to EPF Framework - is clear, concise and informative. The addition of “key benefits” provides an overall well-rounded definition of each project – *at a high level*.

Measures of Success and Impact – As noted above, there is a coherent overview of each project and its linkages – *at a high level*. However, stakeholders would benefit from further detail regarding what measures of success SONI use for specific projects together with the impact a project will have – and upon completion, the conclusions from the project review. These measures might include but not be limited to, cost/benefit, accelerated deployment, reduced system constraints, shorter connection queue etc). SONI's own pre and post evaluation project management systems will capture these elements and distilling them into a stakeholder friendly format would greatly enhance transparency and external understanding.

### SONI Governance

The Panel have previously noted from SONI the pressure on resources due to implementing the new SONI Governance arrangements. The Panel understand that this process is nearing its conclusion and that SONI is now able to turn its full focus to delivering its commitments both under the EPF and its underlying suite of responsibilities as the Northern Ireland TSO.

### System-Wide Costs

One of the key EPF SONI outcomes relates to System wide costs. Specifically, “Northern Ireland electricity consumers get good value for money which reflects efficiency within, and across, different parts of the Northern Ireland electricity system, over the short term and the longer term.”

System service support and Dispatch balancing external costs fall within the ambit of the EPF.

The Panel note that the KPI associated with Imperfections Costs is determined annually ex-post using the PLEXOS back cast model (for this cycle) in December 2026. The Panel suggest that more needs to be done to provide stakeholders with the forward-looking cost information they need to plan effectively.

SONI's initiatives to address system wide costs are embedded within and distributed across the Forward work Plan and span projects under all four Roles. However, it is difficult to find more than qualitative analysis of the impact of these initiatives on system wide costs. This is an area which the EPF panel has raised in previous years. It would be helpful to have further detail on the scale of reduction in such costs and more detail on exactly how the various projects contribute to such a reduction. Examples of how these cost reductions flow through to the end consumer would also be useful.

The issue is a key concern for stakeholders, with Stakeholder submissions consistently referencing the need for a clearer view on the trajectory of these costs and the impact of measures to mitigate them.

The Panel note the view expressed by some that persistently high levels of dispatch down could threaten the momentum of the energy transition in Northern Ireland. It is for SONI to consider whether the provision of more (forecast) information on the trajectory of expected costs would be beneficial not only in allowing stakeholders to plan more effectively but also to inform the ongoing wider discussion regarding the optimal path for the energy transition.

### Organisational Learning

It is clear from the Forward Plan and the additional information provided, that SONI benefit from organisational learning. Criterion 2 of the EPF – UR Service Priority Alignment is detailed in Annex 2 of the EPF guidance and is largely focussed on a culture of innovation, organisational learning and holistic collaboration across the (industry) sector. SONI have demonstrated an increasingly sophisticated and effective Stakeholder strategy and state that there is “A culture of organisational learning, accountability and planning that supports SONI agility and responsiveness in meeting policy, regulatory and market development.” There is clear evidence of organisational learning on a project-by-project basis (and by specific case studies). It would be helpful to understand how organisational learning and overall knowledge management is facilitated and promoted on a systemic basis across SONI’s portfolio of activities, in future Plans.

### Demand Side

The Panel have commented in previous years regarding the addition of demand side innovation into the FWP. In this FWP SONI emphasises the critical role of the demand side in supporting Northern Ireland’s energy transition.

The focus is on Demand Side Units (DSU) with engagement with demand side representatives through “SONI’s business-as-usual stakeholder channels.” A fuller explanation of the work that SONI is undertaking and supporting under the demand side initiative was provided as a response to specific Panel clarificatory questions and this was helpful.

From this it is evident that SONI are working through a number of fora to identify “the range of products which DSUs can provide.” The response provided goes further to identify SONI’s ambition to identify demand side services relevant to both FASS and the Flexibility Needs Assessment initiative. The Panel notes that these two projects are within the scope of the EPF. It is possible that there are additional innovative ways

in which the demand side can be harnessed to complement the existing structure used for Demand Side Units. The Panel look forward to an ambitious and innovative approach to the demand side via these initiatives.

### Self-Assessment

SONI have built on the more detailed justification of their self-assessment which was provided in last year's Plan. This iteration provides greater detail and a clear link between SONI's assessment and each of the four assessment Criteria, covering the four Roles.

## **Review of Forward Work Plan**

### Performance Measures

The Panel notes the provision by SONI of enhanced detail this year on "Performance Measures and Alignment with SONI Outcomes" in Annex A.

- The target for System Non-Synchronous Penetration is clearly explained.
- System Frequency: The Panel has previously observed that in an evolving, more dynamic system, the requirements for control of system frequency are likely to become more onerous and complex. It is understood that the System Frequency target is derived from Grid Code requirements and that the Grid Code itself is generally kept under review. However, it would be helpful to understand whether any work is in place to specifically map the frequency requirements of the 2030 system and consider any resulting Grid Code amendments.
- Imperfections Costs: SONI explain the boundaries of what can be done to set a target for imperfections costs. It may be worth considering whether an additional cost measure could provide value to stakeholders. In operating the system SONI deals with a wide range of issues which include the need to deal with energy imbalances and system constraints. These fall into the wider category of "system costs". With a "perfect" system, there will still be specific costs of accommodating large volumes of variable renewable generation. There may be merit in providing a forward view of the "accommodation costs" of renewable generation for the current and future system. This might include network asset and service costs. The object of this would be to provide stakeholders with a "baseline" for system costs which (through innovation) SONI would seek to reduce.
- Stakeholder Satisfaction: The Panel have noted elsewhere that SONI's stakeholder engagement activities have taken a significant step forward both in scope and depth. During discussions with the SONI team it has been recognised that the stakeholder satisfaction metric could also usefully be developed further

from its current state and SONI have undertaken to do this. The Panel looks forward to the outcome of this work.

- **Timely Delivery of Publications:** It is helpful that SONI have stated that in the unlikely event of delay in publications, stakeholders will be kept fully informed.

## Role 1 - System Operations & Adequacy

### Criterion 1 - Service Ambition

The six projects under Role 1 demonstrate a significant level of ambition.

FASS is indeed both a significant and key energy market reform which has the potential to deliver the services required by a future low carbon system.

In enabling higher levels of renewable integration and support for greater levels of SNSP the Scheduling and Dispatch Project (SDP) is also a fundamental pillar in delivering the desired outcomes.

Given that both these projects are over a multi-year timescale, it is important that the ambition is matched by a realistic and deliverable timetable.

The System Strength Programme is a “leading edge” project which seeks to “transition from global stability constraints to targeted, region-specific metrics that more accurately reflect system strength challenges in a high inverter-based resource (IBR) environment”. It is also a project with high ambition and potentially significant benefits both in the operational and longer-term planning phases. Given that the details of the eventual framework are as yet unavailable (at the start of the Project), it will be instructive to see how the ambition for such a fundamental Project is matched by its outturn.

The minimum stability trial aims to integrate system studies and operational experience to deliver a resilient grid with less reliance on fossil fuel generation. This is a complex multi-faceted project which aims to address a number of key issues simultaneously.

The Northern Ireland negative reserve trial shows innovation whilst the Multi-Year Market Development Plan is highly ambitious both in its scope and depth. Given the deliverables claimed for the Project, it would be expected to require a significant degree of resource over a sustained period to realise them. The Panel have previously commented on the need to map available resource against commitments both on a “per project” and on a coordinated entity wide basis. This is to ensure that plans are realistic, achievable and do not lead to unforeseen mid-period resource reassessments which mitigate against optimal outcomes. SONI have noted that they have a dynamic resource reprioritisation process in place to deal with changing requirements. However, this is a complementary activity to core business wide resource planning activities.

Overall, the Panel consider that the suite of Projects defined under Role 1 in the FWP can be seen as EXCEEDING expectations for the Service Ambition criterion.

### Criterion 2 – UR Service Priority Alignment

The projects reflect a culture of innovation, transparency and collaboration across the sector. Organisational learning is evident in the use of trials, tests, joint working and positive feedback loops from these initiatives. Cooperation/collaboration with both NIE Networks and the UR also forms a key part of the structure for delivery under Role 1.

The Panel consider that SONI's planned activities defined under Role 1 in the FWP can be seen as MEETING expectations for the UR Service Priority Alignment criterion.

### Criterion 3 – Stakeholder Engagement

SONI notes that in developing the projects under Role 1 there has been "close collaboration with the Utility Regulator, DfE, EirGrid, the Operational Policy Review Committee (OPRC) and market participants". This has been achieved through a range of channels including (to be expected) consultations, technical working groups and public workshops. SONI state that they have taken a transparent collaborative approach and actively engaged stakeholders throughout the process, taking on board feedback to inform and refine is approach.

One new initiative, the Multi-Year Market Development Plan, should act as a benchmark for SONI's enhanced approach to stakeholder engagement focussing on a key area for all Industry stakeholders.

One outcome claimed for the approach is "stakeholder confidence". Whilst this is difficult to measure, since it is a claimed benefit, some tangible examples would be welcome in future (perhaps as part of the relevant Performance Report).

The Panel consider that SONI's planned activities and approach defined under Role 1 in the FWP can be seen as MEETING expectations for the Stakeholder Engagement criterion

### Criterion 4 - Service Accountability

Under the accountability criterion, the Panel consider the degree of clarity on SONI's planned activities and initiatives and how the success or performance in relation to these would be assessed (e.g. detailed specification of deliverables and measures of

success). By its nature Role 1 demands a strong degree of accountability regarding project definition and a high degree of confidence in deliverables/outcomes. SONI have noted in the Plan its expected timelines and deliverables. SONI also note the steps taken under their performance management plan to deliver the range of required processes and outcomes associated with Role 1.

For any forward Plan, the level of detail is necessarily limited and this is noted. The deliverables are stated at a high level, as are the measures of success across Role 1 *Projects*.

It is evident that SONI have a clear commitment to service accountability which runs through the entire Plan.

The Panel consider that SONI's planned activities and approach defined under Role 1 in the FWP can be seen as MEETING expectations for the Service Accountability criterion.

### Role 1 - Contribution to Outcomes

**Decarbonisation** – Through addressing the barriers to the increased deployment of renewable energy via the suite of projects and initiatives under Role 1, SONI is making a significant contribution to delivering the 80% renewable electricity target by 2030

**Grid Security** – SONI's activities in seeking to increase the deployment of renewables are complemented and balanced by its efforts to ensure that the system remains safe, secure and stable. In particular the new "System Strength" project and the Negative Reserve trial display a proactive approach to the challenges.

**System Wide Costs** – There is a clear linkage between SONI's projects under the System Operations Role and a focus on optimising system costs within the available envelope. The ambition to further minimize costs through innovation as the system develops is also evident. The Panel have commented elsewhere that more needs to be done to provide stakeholders with tangible measures regarding system costs, the scale of any "savings" and their trajectory. It is acknowledged that there are several variables in this analysis, but it would be of use to a range of stakeholders.

**SONI Service Quality** – In plans under Role 1, SONI demonstrates a commitment to transparency and working with stakeholders to provide the information they need, in an appropriate form. The use of enhanced, structured engagement and feedback is also evident.

### **Role 2 – Independent Expert**

### Criterion 1 - Service Ambition

SONI continues to develop and enhance its activities under Role 2. There is a significant level of ambition and forward thinking embodied in the aspiration to be a “trusted, impartial voice shaping Northern Ireland’s energy future”. It would be useful if SONI could clarify what it believes to be the extent of its *formal* responsibilities under this role in addition to its implicit position of Industry authority as the responsible TSO for Northern Ireland.

Significant initiatives include the “Plan led” system development proposal and the Dispatch Down Programme. Examples of forward thinking include the Grid Forming and Digitalisation Strategies.

The Innovation strategy itself demonstrates a stretching target. SONI intends to “foster innovation” and “accelerate deployment” of relevant innovations in enabling the deployment of new technologies/techniques to meet the challenge of the 2030 and 2035 SNSP targets. The intent is laudable. It will be instructive to see the contents of the finished strategy to ascertain exactly how SONI will drive innovation, which not only involves technologies but also fostering the appropriate *culture of innovation* both inside and external to the organisation.

Creativity is an essential component of innovation. SONI took its stakeholder engagement to a new level by leveraging external expertise to unlock its potential. There may be value in assessing whether there are lessons to be learned from external/third party experience where other institutions have faced a similar significant “innovation challenge” and benefited from transitional assistance.

Overall, the Panel consider that the suite of Projects defined under Role 2 in the FWP can be seen as EXCEEDING expectations for the Service Ambition criterion.

### Criterion 2 – UR Service Priority Alignment

In setting out its service ambition (above) for Role 2, it is clear that SONI is committed to its role as a trusted, impartial advisor. SONI’s input is valuable in any area where it has expertise. The Panel have noted elsewhere that it would be helpful for both SONI and wider industry if its formal responsibilities (e.g. such as a statutory consultee) regarding its role as an Independent Expert were a little clearer.

The projects and activities under Role 2 reflect a culture of innovation, transparency and collaboration, together with a commitment to productive engagement.

SONI notes that whole-system collaboration forms part of the efforts under Role 2, based on close working with NIE Networks. The Panel have previously noted that there may be a difference between outcomes based on whole system *collaboration*; and whole system *optimisation*. The Panel look forward to the results of this work.

SONI's planned activities and approach defined under Role 2 can be seen as EXCEEDING expectations for the UR Service Priority Alignment criterion.

### Criterion 3 – Stakeholder Engagement

It is evident throughout the Plan that SONI have a strong commitment to stakeholder engagement and a commitment to continuous improvement. The focus and level of activity in this area continue to accelerate, particularly with regard to the activities under Role 2. The outcomes of this work also demonstrate a significant positive change. The formal inclusion of stakeholders in developing the SRP 27 Business Plan and the establishment of the Stakeholder Advisory Challenge Group are both innovative and welcome initiatives.

Activity under the “projects” area also shows that SONI are not only engaging with stakeholders but carefully integrating their input on an iterative basis and explaining resultant outcomes.

SONI's planned activities and approach defined under Role 2 can be seen as EXCEEDING expectations for the Stakeholder Engagement criterion.

### Criterion 4 - Service Accountability

Role 2 demands a strong degree of accountability regarding those areas where SONI is providing or leveraging its Independent Expertise. Each of the projects demonstrates a high level of accountability in its project definition, timelines, governance arrangements, clarity and structure. There is a strong commitment to engagement, feedback and transparency.

The Panel consider that SONI's planned activities and approach defined under Role 2 in the FWP can be seen as EXCEEDING expectations for the Service Accountability criterion.

### Role 2 - Contribution to Outcomes

**Decarbonisation** – The Plan demonstrates many clear links between SONI's role as an Independent Expert and the decarbonisation objectives for Northern Ireland. Through working with stakeholders on innovation, advising government and taking a proactive stance when developing initiatives, it can be seen that a comprehensive and holistic approach is at the heart of the Plan

**Grid Security** – Given the need to ensure Grid Security at all times and particularly against a challenging and changing background, SONI's expertise is essential to

deliver the required outcomes. There is ample evidence of this being leveraged in the Plan. The level of innovation required may be enhanced by collaboration with other entities outside of the traditional electricity space as part of SONI's Innovation Strategy

**System Wide Costs** – Decarbonisation objectives could lead to excess costs for consumers if not managed on a comprehensive and multiyear timeframe. SONI's expertise is vital in this area to chart a "least cost-maximum benefit" path to the desired goals. There is evidence throughout the Plan that SONI recognises this and is planning accordingly.

**SONI Service Quality** – In plans under Role 2, SONI demonstrates a commitment to transparency and working with stakeholders to provide the information they need, in an appropriate form. The use of enhanced, structured engagement and feedback is also evident.

## **Role 3 System Planning**

### Criterion 1 - Service Ambition

System Planning (and delivery) is a key activity for SONI. The challenges in delivering a fit for purpose system to fully meet the challenges of the energy transition demand an ambitious and innovative approach if they are to be met.

The projects detailed within Role 3 show a step change in the level of ambition accompanied by an open approach to novel ways of facilitating the necessary progress. The focus by SONI on not just *strategic* but *anticipatory* investment is very welcome. This is also reflected in the enhanced cooperation with NIE Networks via the JPMO initiative.

SONI notes the development of its Transmission Cluster Policy. This together with the evolving "Plan led" approach to system development is expected to unlock progress towards network development and decarbonisation goals. It will be instructive to see how these initiatives deliver their anticipated benefits in practice.

SONI's planned activities and approach defined under Role 3 in the FWP can be seen as EXCEEDING expectations for the Service Ambition criterion.

### Criterion 2 – UR Service Priority Alignment

In undertaking its transmission system planning role SONI shows through the Forward Plan its commitment to transparency, collaboration, inclusivity and forward-thinking solutions. SONI notes that through its efforts it is "building confidence" in its Plans and this is a welcome development. SONI notes the evolution of the JPMO

and other collaborative mechanisms with NIE Networks to provide enhanced benefits. These activities are in alignment with the Utility Regulator's priorities.

SONI's planned activities and approach defined under Role 3 can be seen as MEETING expectations for the UR Service Priority Alignment criterion.

#### Criterion 3 – Stakeholder Engagement

The Panel have already noted that throughout the Plan that SONI consider stakeholder engagement to be a core priority and a commitment to continuous improvement. The focus and level of activity in this area continues to accelerate, particularly with regard to the activities under Role 3. The outcome of this work also demonstrates a significant positive change. SONI's ambition is that the development of the JPMO with NIE Networks will "transform" transparency and coordination in system planning. This is ambitious and if realised will represent a major step forward. The specific examples provided by SONI regarding stakeholder engagement under Role 3 demonstrate a commitment and follow through exceeding "business as normal" processes.

SONI's planned activities and approach defined under Role 3 can be seen as EXCEEDING expectations for the Stakeholder Engagement criterion.

#### Criterion 4 - Service Accountability

It is clear both in SONI's plans for its statutory activities (TDPNI, TYTFS) and "elective" projects under Role 3 that there is a consistent commitment to accountability. This is supported by structured engagement, an open and transparent environment of stakeholder feedback and input. This is overlaid by a rigorous and robust approach to transmission system planning.

SONI's planned activities and approach defined under Role 3 can be seen as MEETING expectations for the Service Accountability criterion.

#### Role 3 – Contribution to Outcomes

**Decarbonisation** – Clearly, effective and forward-thinking system planning is a key element in the delivery of decarbonisation objectives.

**Grid Security** – Grid security is rightly at the heart of system planning and SONI continue to balance new and innovative projects with the need to secure the grid under a changing and challenging period.

**System Wide Costs** – System planning requires the complex juxtaposition of a range of technical, commercial and operational elements. These are rarely static in nature. System costs have a direct impact on stakeholders and minimising these whilst delivering other core objectives is a key activity. The Plan recognises these challenges and sets out a path to meet them. As before, more detail on cost trajectories and “costs saved” would be helpful from both an analytical and “policy affirming” perspective.

**SONI Service Quality** – In plans under Role 3, SONI demonstrates a commitment to transparency and working with stakeholders to provide the information they need, in an appropriate form. The use of enhanced, structured engagement and feedback is also evident. This is particularly the case in the efforts being devoted to the specific engagement strategies being used for system development.

## **Role 4 Commercial Interface**

### Criterion 1 - Service Ambition

In order to deliver the energy transition SONI require a range of relationships outside of the organisation, including those of a commercial nature. The Plan recognises that these are not purely transactional and that working with commercial partners (sometimes at a very early stage) will lead to improved outcomes for all stakeholders. Commercial partners require as much clarity as possible, at each stage of a particular process. This in turn requires good communication, transparency of objectives for the interaction and (at times) collaboration to develop new and/or reformed structures to allow benefit to be delivered. SONI recognise these features in the Plan and there is evidence that in projects such as LCIS and LDES the approach is assisting their ambitions in moving forwards.

Notably absent is any mention of the “customer journey” for those wishing to connect to the transmission system. At a time of great change, not just for the system but for the processes which impact connectees (e.g. the changes to “Plan led” and the adoption of the “Cluster Policy”) it would be useful to understand how SONI supports and engages connectees to navigate the changing landscape as efficiently and effectively as possible.

Overall SONI’s activities under Role 4 may be seen as MEETING the Service Ambition criterion.

### Criterion 2 – UR Service Priority Alignment

The Plan provides sufficient evidence of SONI’s commitment to the UR Service Priorities, particularly with regard to initiatives such as LDES and LCIS and the

developing collaborative approach with NIE Networks. It would be helpful if similar evidence were available for other commercial partners (primarily those seeking to connect to the system). SONI notes that it is exploring “new service models” and it will be instructive to understand the benefits of these in due course.

SONI’s activities under Role 4 may be seen as MEETING the UR Service Priority Alignment criterion.

### Criterion 3 – Stakeholder Engagement

Throughout the Plan SONI set stakeholder engagement as a core priority.

For Role 4 SONI notes that this engagement is more specific and targeted. Nonetheless, for the core activities the general theme of a much more developed stakeholder engagement and management process is evident, with SONI seeking external input where relevant for novel and innovative projects. The Panel repeat our observations regarding stakeholders wishing to connect to the system.

SONI’s activities under Role 4 may be seen as MEETING the Stakeholder Engagement criterion.

### Criterion 4 - Service Accountability

LCIS and LDES are critical projects under Role 4. They demand a clear and consistent commitment to accountability if they are to succeed. SONI note that the initiatives encompass “clear milestones, structured oversight and detailed technical assessments”. Consultation with the SEMC and Regulatory Authorities, EirGrid, NIE Networks, and ACER forms an integral part of the activities under Role 4.

SONI’s planned activities and approach defined under Role 4 can be seen as MEETING expectations for the Service Accountability criterion.

### Role 4 – Contribution to Outcomes

**Decarbonisation** – The commercial interface role is critical to delivering the new and enhanced services which the system will need to deliver the energy transition. SONI’s ambition and activities are fully aligned with this.

**Grid Security** – The development and introduction of novel and/or enhanced technologies and services must be balanced with the need to maintain a secure and stable system. SONI’s structured approach in this area demonstrates a full appreciation of the checks and balances required in moving forwards

**System Wide Costs** – The activities under Role 4 either seek to mitigate system costs or reduce them by the use of innovation and/or new processes and techniques, as the system transitions towards a lower/zero carbon state.

**SONI Service Quality** – SONI are demonstrating alignment with the Service Quality outcome by working collaboratively with potential new service providers. This in turn allows more efficient planning and outcomes for external partners/stakeholders.

### **Grading of the Forward Work Plan**

In the EPF Guidance, UR provided the Panel with a mechanistic methodology for arriving at an overall assessment grade. This involves attributing a score for how each criterion was met in each of the four SONI roles, arriving at an aggregate, weighted score across the criteria, then a corresponding grade for each role, and ultimately a weighted-average overall assessment grade for the Plan.

Each Panel member separately undertook the assessment in advance of the meeting of the Panel on 18 November 2025. In that meeting, the Panel reviewed evidence submitted by stakeholders, revisited individual scoring where appropriate, agreed a consensus score for each criterion, and thus agreed grades for each role and an overall assessment grade for the Plan.

The results of this process are given in the following Table.

[The criterion scores run from -1 to +1, the assessment grades run from 1 (poor) to 5 (excellent). Grade 3 is “baseline”]

		Role 1	Role 2	Role 3	Role 4
		System Operation and Adequacy	Independent Expert	System Planning	Commercial Interface
Weights	27.5	25	25	22.5	
Criterion	Criterion	Score	Score	Score	Score
1	Service Ambition	1	1	1	0
2	UR Service Priority Alignment	0	0	0	0
3	Stakeholder Engagement	0	1	1	0
4	Service Accountability	0	0	0	0
<b>Assessment Total</b>	(Criterion 1 score x2)	2	3	3	0
<b>Assessment</b>	<b>Grade</b>	4	5	5	3
<b>Overall Grade</b>		<b>4.275</b>			

The Plan is rated “good” (according to the UR grading guidance) for Role 1, System Operation and Adequacy.

The Plan is rated “excellent” for Roles 2 and 3

The Plan is rated “baseline” for Role 4, Commercial Interface.

The Panel assessed overall grade for the Forward Work Plan is 4.275, which is deemed between “good” and “excellent”.

The Panel notes that this is an improvement on the assessed grade for the previous Forward Work Plan.

The Panel considers that the Plan demonstrates a positive approach to the EPF process, and continued progress year-on-year, particularly in the further development of the Stakeholder Engagement Framework and the establishment of a clear and robust SONI Strategy to support its range of responsibilities.