



iPower Comments on SONI Evaluative Performance Framework Performance Report 2024 - 2025 closing 06.02.2026

iPower Flexible Energy participates actively in both the Aggregated Generator Unit (AGU) and Demand Side Unit (DSU) sectors of the electricity industry. Through these activities, iPower plays a significant role in supporting the operation of the I-SEM balancing market and facilitating the continued integration of renewable generation.

iPower currently operates approximately 100 MW of flexible capacity, providing a material contribution to system support and stability. We have experience working collaboratively with SONI and EirGrid to support secure and balanced system operations. In addition, iPower is a member of FERA, whose members collectively represent circa 200 MW of registered capacity across the island.

iPower Flexible Energy welcomes the opportunity to provide feedback on SONI's Annual Performance Report for 2024/25. Overall, we consider the report to be a strong, well-evidenced and transparent account of performance, delivered in a year characterised by significant operational, policy and system-wide challenges.

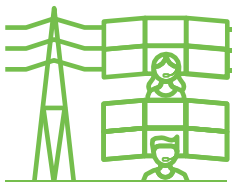
The Performance Report provides a balanced narrative, combining evidence of delivery with appropriate explanation of external constraints and clear reflection on lessons learned. Alignment with the Forward Work Plan, consistent role-based structure, and the use of detailed appendices helps stakeholders in understanding what was within SONI's control, what was delivered in-year, and how performance has been assessed.

iPower broadly supports the outcome, with strong performance evident under the Independent Expert role, and a compelling account of delivery under sustained system stress within System Operations and Adequacy. We welcome the measured approach taken under the Commercial Interface role, where SONI limits its self-assessment to what was genuinely delivered within the EPF period and within its control.

Key Strengths

Operational resilience and openness: The report clearly demonstrates SONI's ability to maintain system security during more extreme conditions.

Maturing stakeholder engagement: The development of a multi-year Stakeholder Engagement Strategy, supported by an Engagement Evaluation Framework and standing engagement forums, reflects a move towards a more structured and embedded approach rather than



1 LISSUE WALK, LISBURN, BT28 2LU
+44 (0) 28 9600 2900

CONTACT@IPOWERFLEX.ENERGY
WWW.IPOWERFLEX.ENERGY
COMPANY REG. NUMBER N1072405





reliance on ad-hoc initiatives. iPower welcomes continuing regular engagement with SONI though FERA and as an individual stakeholder.

Whole-system collaboration: The emphasis on joint working with NIE Networks and other system partners demonstrates an increasingly integrated, system-wide perspective on planning and delivery.

Balanced self-assessment: SONI's willingness to adopt a conservative position where appropriate (notably in LCIS Phase 2) enhances the overall credibility of the self-assessment.

iPower offers a small number of observations where additional clarity or refinement could further strengthen.

Adaptability:

SONI appropriately highlights adaptability in response to unanticipated challenges. In some cases, further clarity in distinguishing between adaptability that mitigates delivery risk and adaptability that delivers additional value beyond the original plan would help reinforce alignment with EPF terminology and expectations.

Role as trusted advisor:

The handling of issues such as environmental constraints at Kilroot illustrates SONI's evolving role as a trusted technical advisor to government departments and regulators. While the report demonstrates effective engagement to secure short-term system support, there remains a broader question as to how lessons from such episodes are fed back into longer-term policy and technology selection decisions, particularly where certain technologies may face structural constraints on availability.

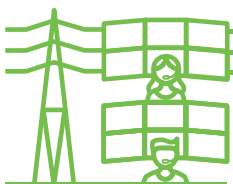
Proactive system foresight:

Initiatives such as the Dispatch Down Action Plan are rightly presented as success stories. However, from a participant perspective, there is value in continued focus on whether the impacts that prompted such interventions could, in some cases, be anticipated earlier through system modelling and scheduling foresight, thereby reducing disruptive impacts on market participants.

Consumer Value:

For initiatives such as LCIS Phase 2, we support SONI's cautious scoring approach. Looking ahead, clarity on how consumer value will be demonstrated relative to alternative approaches, once implementation progresses, will further strengthen the overall framework.

iPower considers SONI's 2024/25 Annual Performance Report to be aligned with the intent of the EPF. The report reflects clarity in performance reporting, stakeholder engagement and self-reflection, and demonstrates clear learning from previous assessment cycles. Our comments are offered in a supportive and constructive spirit, aimed at enhancing clarity and evidential



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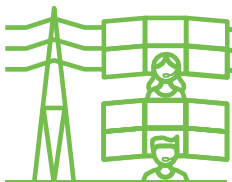


strength. We hope they are helpful to both SONI and the Independent Panel in considering the 2024/25 assessment.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M O'Kane".

Matt O'Kane
CEO
iPower Flexible Energy



📍 1 LISSUE WALK, LISBURN, BT28 2LU
☎ +44 (0) 28 9600 2900

✉ CONTACT@IPOWERFLEX.ENERGY
🌐 WWW.IPOWERFLEX.ENERGY
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