

EP UK Investments Response to Consultation on Draft Forward Work Programme 2026/2027

EP UK Investments ('**EPUKI**') welcomes the opportunity to respond to this consultation paper and to provide feedback on UREGNI's Forward Work Programme ('**FWP**'). EPUKI is supportive of the strategic objectives which underly UREGNI's corporate strategy and help to inform the FWP. In general, EPUKI agrees with the projects which have been included in the FWP but has recommendations with regards to projects which have not been included.

Licence Fees

EPUKI is concerned with the recent trend of increasing licence fees and requests transparency around same. It is unclear what, if any, efficiencies or improvements have been delivered as a result of these increased fees.

Review of Hybrid Connections in Northern Ireland

EPUKI notes that the development and implementation of robust hybrid electricity connections are not included as a project in the FWP. Hybrid connections can bring a number of benefits to the system which align with UREGNI's strategic objectives. For example, the co-location of wind or solar generation with electricity storage supports the transition to net zero, while simultaneously contributing to Security of Supply by enabling the export of power when wind and/or solar is unavailable.

Work has already been carried out to examine how hybrid connections can be enabled in Northern Ireland. SONI and NIE Networks published a paper¹ in October 2023 where they outlined their intention to enable hybrid connections through both the removal of the Maximum Export Capacity ('**MEC**') over install limit, and the development of an MEC sharing mechanism. This paper also outlines a number of issues which would need to be resolved before these arrangements can be implemented. Unfortunately, there has been no updates on either of these workstreams since the publication of this paper.

It is noted that similar policy developments have been delivered in Republic of Ireland ('**ROI**') in the meantime. In January 2024, the Commission for Regulation of Utilities ('**CRU**') published a decision paper removing the MEC over install limit². This was followed by a CRU consultation in March 2025 which sought feedback on a policy proposal to allow units to share a single MEC behind a single connection point. These developments mean that Northern Ireland is at risk of falling behind with respect to hybrid policy. This would represent an issue with respect to fairness across the Single

¹ <https://www.nienetworks.co.uk/getattachment/c036eeaf-a6e6-4c8f-a3f7-d5867dc8705c/NI-Over-Install-Decision-Paper.pdf>

² https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU202402_Installed_Capacity_Cap_Decision_paper_2024_378881.PDF

Electricity Market (**SEM**), and also risk losing investment in hybrid projects which would help to deliver the energy transition while also supporting Security of Supply.

EPUKI acknowledges that the majority of the work associated with this policy sit with SONI and NIE Networks in their respective roles of Transmission System Operator and Transmission Asset Owner. As such, this may not represent a project with the same scale and resource requirement of other projects listed on the FWP. However, EPUKI considers it important that UREGNI engages with both SONI and NIE Networks and seeks to ensure that these workstreams are progressed in a timely manner.