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The Utility Regulator,
Millennium House,
Great Victoria Street,
Belfast. BT2 7AQ

16 February 2026

Dear Utility Regulator

Re: Draft Forward Work Programme (FWP) for 2026/27

Thank you for the opportunity to comment on the Utility Regulator (“UR”) Draft Forward Work Programme (“FWP”) 2026-27. This response is on behalf of SONI Ltd., the licenced electricity Transmission System Operator for Northern Ireland, as well as the licenced electricity Market Operator (delivered via contractual joint venture with EirGrid plc, the Irish TSO).

SONI welcomes the clarity that the FWP brings in terms of the UR’s work over the coming twelve months.

SONI has the following comments on specific workstreams identified in the FWP:

Part 1: Strategic Objective 2: Project Reference 1 (Establish the regulatory frameworks required for interconnectors)

SONI notes that a consultation¹ on this matter was published on 03 December 2025. In this consultation there is reference to SONI providing technical support for the UR’s assessment on the need for a regulated operating revenue regime for future interconnection.

SONI’s Strategy 2025-31² outlines our ambition to enhance our role as trusted advisor to the NI Executive and the Utility Regulator, and providing technical support to the UR in their assessment of future interconnection would dovetail with this strategic ambition. However, SONI’s ability to provide this support and deliver on our strategy is contingent on adequate resourcing (provided through the SRP27 price control or uncertainty mechanisms).

¹ <https://www.uregni.gov.uk/news-centre/consultation-our-assessment-need-regulated-operating-revenue-regime-future>

² <https://cms.soni.ltd.uk/sites/default/files/2025-02/SONI%20Strategy%20Document%202025-2031%20Final.pdf>



Without this funding, SONI's ability to provide technical support will be limited. We would welcome further engagement with the UR on the scope of work required.

Part 1: Strategic Objective 3: Project Reference 1 (SONI Price Control 2027-32)

The price control (SRP27) will be a key piece of work for SONI over the coming year. We will submit our Business Plan to the UR by 02 March 2026. This will be followed by a query process over the summer and draft determination in August 2026.

Given staff availability and board meeting schedules tend to drop over the summer months, both SONI and the UR will need to ensure that sufficient resources are available to meet these deadlines.

SONI's Business Plan will lay out the benefits that SONI can deliver to Northern Ireland consumers. A key focus of the business plan is the challenges that SONI will face in terms of financing its activities over the coming years. This is particularly driven by the requests to hold working capital facilities to underpin the market and the new future arrangements for system services (FASS) from the SEM Committee.

As a non-state-owned asset-light business – unique among European TSOs who tend to be part of larger vertically integrated utilities – we have a limited ability to borrow significant amounts of money. Other comparator organisations typically have asset bases that can be used to leverage larger borrowing, for example to provide market working capital. SONI's ability to do this is far more limited.

As such, SONI's ability to fund required investments in IT capability and network planning may be limited by the size of the working capital facilities that we are being requested to hold by the SEM Committee. Therefore, it is vital that the UR Markets Directorate are also closely involved in the SRP27 process throughout. Market design and SONI's price control framework cannot be considered in isolation to one another. We therefore suggest that the Markets directorate are explicitly listed as one of the lead teams for this project in the UR's final FWP publication.

Part 2: Strategic Objective 1: Project Reference 1 (Undertake a public consultation on firm access arrangements)

SONI is currently working towards an update to our firm access methodology, which we will publish for consultation in 2026. This update is based on existing firm access principles but updating on the previous methodology to account for updates to policy in the interim.

SONI welcome the UR's wider review on firm access, which we believe is key to providing the right signals and incentives for locating new generation and is a key pillar of a more planned approach to network development. Further updates to our own firm access methodology will likely be required following conclusion of this work.



We are working closely with the UR on the current firm access scoping exercise and are keen to support the UR's development of a new firm access policy.

Part 2: Strategic Objective 1: Project Reference 2 (Develop tariff structures that are cost reflective, encourage efficient energy use, and support the transition to net zero through the introduction of Time of Use (ToU) and dynamic pricing models)

From engagement with the UR, we understand that this project in the first instance will look at Demand Use of System (DUoS) charges, which are levied by NIE Networks on suppliers.

However, other charges levied on suppliers by SONI or SEMO will also impact time of use and dynamic pricing models:

Charge	Responsible	Current approach	Levied by
STUoS	UR	Time of use p/kWh	SONI (for NIEN)
SSS	UR	Flat p/kWh	SONI
Imperfections Charge	SEM Committee	Flat p/kWh	SEMO
Capacity Charge	SEM Committee	Flat p/kWh during specific times of day	SEMO
<i>FASS Charge</i>	<i>SEM Committee</i>	<i>TBC</i>	<i>SONI</i>
CAIRt	UR	Flat p/kWh	SONI (for Moyle Interconnector Ltd.)

In time, it is SONI's view that the UR's review of tariff structures should also consider these charges (including the all-island tariffs for which the SEM Committee is responsible for).

SONI will support the UR with this review where appropriate and resources allow. In this vein, SONI supports a focus on DUoS in 2026/27.

As outlined in the SONI Price Control comments, the UR Markets Directorate will also need to be closely involved in this project in future, given that some of the charges are regulated by the SEM Committee on an all-island basis.

Part 2: Strategic Objective 1: Project Reference 3 (Develop a regulatory framework for offshore wind)

As outlined in our comments to *Part 1: Strategic Objective 2: Project Reference 1 (Establish the regulatory frameworks required for interconnectors)*, SONI's ambition is to be able to support the Utility Regulator in projects such as this by providing data-driven and evidence-



based technical expertise to decision-makers within the UR and the NI Executive. However, to deliver this ambition, SONI must be adequately resourced to provide ad hoc support to projects on top of delivering its business-as-usual work. We would welcome further engagement with the UR on the scope of work required, building on the support we have provided in recent years.

Other comments

SONI notes that the draft FWP also includes the statement:

“During 2026/2027, we will engage with industry and other stakeholders to develop a strategy for the SEM, supporting the electricity Transmission System Operators (TSOs) with a multi-year plan of workstreams and priorities.”

SONI would like to emphasise that the proposed multi-year markets roadmap is a SEM Committee document, not a TSO plan.

SONI, in its role as TSO and Market Operator for Northern Ireland, will of course support the UR and the SEM Committee in implementing their multi-year markets roadmap, and we welcome the clarity that this document will provide once it is finalised. We would suggest that the wording in the document is updated to make it clear that the multi-year plan is a SEM Committee document, not a TSO document.

SONI also notes that the FWP paper has less detail than in previous years. Whilst we understand the focus on the more strategic aspects of the UR remit, it is important that scale of work to be undertaken in the year ahead is transparent. In previous years this information has helped SONI incorporate areas where we can provide support to the UR into our own plans. SONI would encourage the UR to continue the level of transparency that was included in previous versions of the UR FWP.

Yours sincerely,
Rowan Tunnicliffe
Head of Commercial & Regulation, SONI Ltd.