

# **Evaluative Performance Framework Panel**

## **Assessment of Northern Ireland Electricity Networks**

### **Forward Work Plan for April 2026 - March 2027**

## Table of Contents

1.	Executive Summary .....	3
2.	Acknowledgements .....	5
3.	Introduction .....	6
4.	Panel Assessment Process.....	7
4.1.	Publication and format of the Forward Work Plan .....	8
4.2.	Stakeholder consultation on the Forward Work Plan.....	9
5.	Overall commentary on the Forward Work Plan.....	11
6.	Review of the Six Forward Work Plan projects .....	12
7.	Project specific comments .....	13
	A1 – Flexible Connections.....	13
	A2 – Enhancing Customer Connections.....	14
	B1 – Proactive Communication around Storms.....	15
	B2 – Deploying Generation as we Rebuild the HV Network.....	16
	C1 – Dynamic Line Rating at Scale.....	17
	C2 – Green Skills Action Plan (withdrawn from the EPF evaluation) .....	18
8.	Grading of the Forward Work Plan.....	19
8.1.	Commentary on the Grading .....	20
9.	Guidance for the Development of Future Forward Work Plans .....	21
10.	Closing comments .....	21

## 1. Executive Summary

The Evaluative Performance Framework (EPF), introduced by the Utility Regulator (UR) under RP7, establishes a structured approach to encourage NI Electricity Networks (NIEN) to deliver enhanced performance across four strategic roles: DSO transition and whole-system collaboration, Innovation, Sustainability, and Customer Service Quality. The independent Panel, appointed in October 2025, has completed its first assessment of NIEN's Forward Work Plan (FWP) for 2026/27 and what follows is its report.

NIEN published its FWP entitled *Transforming Our Business* on 30 October 2025 and followed this with a proactive consultation period. The Plan sets out six projects across three themes: Improving Customer Connections, Customer Confidence and Experience, and Supporting the Energy Transition. This thematic clarity was welcomed by the Panel, who recognised that the portfolio reflects a genuinely customer-centric approach and demonstrates NIEN's commitment to playing a more strategic role during a period of significant system change.

Overall, the Panel viewed this first FWP as a strong and encouraging start. The company is to be commended for producing a comprehensive and high-quality Plan whose projects collectively strike a balance between customer-focused improvements and initiatives that support wider energy-system transformation, with several demonstrating ambition beyond business as usual (BAU) expectations.

The Panel noted a range of project-level strengths across the FWP:

- **Flexible Connections (A1)** was recognised as a proactive, timely and strategically important initiative that responds directly to customer demand and accelerates renewable integration—an important innovation within the NI context.
- **Enhancing Customer Connections (A2)** introduces reforms that will improve transparency, communication, and customer experience, addressing issues that stakeholders have long highlighted.
- **Proactive Communication Around Storms (B1)** represents a step-change in how NIEN supports customers during severe weather events and demonstrates NIEN's strong operational foundations and commitment to vulnerable customers.
- **Deploying Generation during HV Rebuilds (B2)** was seen as a well-designed, highly beneficial project that will materially improve service quality and build confidence among customers and businesses affected by planned outages.
- **Dynamic Line Rating at Scale (C1)** was viewed as innovative, strategically aligned, and capable of delivering significant systemwide benefits through improved network utilisation and reduced curtailment.
- **The Green Skills Action Plan (C2)**, though withdrawn from EPF scoring, reflects NIEN's willingness to demonstrate leadership on a major societal challenge and was positively regarded for its collaborative ambition.

While the Panel identified a number of areas for improvement including clearer articulation of BAU distinctions, SMARTer KPIs, demonstrable outcomes and measurable targets, as well as inclusion of environmental metrics, they accepted that

these are typical of any first-year cycle under a new regulatory mechanism. NIEN's openness to Panel feedback, the constructive dialogue with project leads, and the company's willingness to refine future FWP's were considered strong indicators of its commitment to continuous improvement.

The Panel completed its assessment and scoring process in January 2026, drawing on individual evaluations, stakeholder evidence, and detailed discussions with the company. The Panel concluded that NIEN has laid a solid basis for the EPF, demonstrating initiative, ambition, and a strong customer focus. It also aligns with the targets and ambitions in the Climate Change Act. With further refinement in project design and measurement, future FWP's have the potential to deliver even more significant benefits for customers, the energy system, the delivery of climate change targets and the wider NI economy.

## 2. Acknowledgements

The Panel would like to thank all those members of the NIEN team for their input to the process, particularly Tim Cox and Ben Cupples who led on the establishment of the Panel, co-ordination within NIEN and overall administration support.

It is important to record that everyone we met from those involved in the valuable induction/onboarding briefings and site visits to the individual project leads who took us through the detail of the FWP projects before Christmas, were positive, customer-focused, open and transparent and clearly keen to understand how the EPF could add value to the company's work, help deliver value for customers and contribute to a fair and reliable low carbon future for NI. We felt that all the dialogue was productive and that NIEN staff were receptive to the Panel's views and questions.

Senior management support for the EPF process was also evident throughout this first phase of the Panel's work most notably through the visible leadership of NIEN's Managing Director, Derek Hynes.

We would like to engage further with the company after completion of the EPF process by the UR to discuss lessons learned and our overall findings, especially areas for improvement.

We also want to thank those members of the UR who provided guidance to the Panel and would welcome a follow up opportunity to discuss our experience with this first element of the EPF under RP7.

### 3. Introduction

1. As part of the RP7 Price Control (1 April 2025 – 31 March 2031), the Utility Regulator (UR) introduced the Evaluative Performance Framework (EPF), the primary purpose of which is to provide financial and reputational incentives to NIEN to encourage performance across four strategic roles which will deliver benefits to NI customers particularly given the challenges and opportunities of the changing energy environment.
2. One element of the EPF is the establishment of an expert Panel to independently assess and constructively challenge NIEN's planned and actual performance using the guidance provided by the UR in Annex V of the RP7 Final Determination published on 30 October 2024. The UR, as the decision making body, will take full account of the Panel assessment and recommendations when determining any financial incentive payments/penalties to be applied to NIEN – RP7 provides for a performance incentive amount of between minus £3m and plus £3m each year of the Price Control in which the EPF is operational.
3. There are 2 phases of Panel assessment each year – evaluation of the company's Forward Work Plan (FWP) and then review and assessment of its Annual Performance Report. In conducting its assessments, the Panel is expected to draw on evidence and views provided by NIEN along with views from stakeholder engagements and consultations. The FWP is intended to set out initiatives which are not funded within RP7 and which go beyond the company's BAU activities.
4. The Panel does not have any decision-making powers; rather, its evaluation forms a recommendation to the UR. It is required to determine a grade for each phase of its assessments and provide this to the UR along with its reasoning so that the UR can determine an incentive amount (positive or negative) up to a maximum of £3m either way per financial year.
5. The Panel was appointed on 1 October 2025 (ahead of NIEN's FWP publication on 31 October 2025) and consists of 5 members with a mix of skills, expertise, knowledge and experience:
  - Jenny Pyper, former CEO of the Utility Regulator (Panel Chair)
  - Professor David Flynn - Professor of Cyber Physical Systems, University of Glasgow
  - Kevin Hegarty - Delivery Director, NI Investment Strategy, SIB
  - Kate Martin-Bruintjes - Director of Green Unlimited
  - Dr Cathy McClay - Managing Director of National Grid DSO

Further information on the EPF, Panel member profiles and an overview of the 2026/27 FWP can be found on the NIEN microsite ([link](#)). The full Evaluative Performance Framework is set out in Annex V of the RP7 Final Determination ([link](#)).

## 4. Panel Assessment Process

6. As set out in the RP7 Final Determination Annex V, the Panel is required to assess an annual FWP published by NIEN each October, with recommendations to the UR by the following January and then to review performance against that FWP by the following August after publication of the company's Performance Review in May.
7. As the first FWP under the EPF was published in October 2025, in practice this means that performance against it will not be evaluated by the Panel until summer 2027.
8. The guidance issued by UR in reviewing and evaluating the Forward Work Plan requires the Panel to consider four key criteria viz.
  - Service Ambition;
  - UR Service Priority, Climate Change Act (NI) and Energy Strategy Alignment;
  - Stakeholder Engagement; and
  - Service Accountability

in each of the four NIEN roles:

- DSO transition and whole system collaboration;
  - Innovation;
  - Sustainability; and
  - Customer Service quality
9. RP7 Annex V states that in order to inform its evaluation the Panel will review:
    - the FWP;
    - submissions from the UR;
    - submissions from other stakeholders; and
    - participate in meetings with stakeholders on the Plan.

Annex V also refers to interaction with the Consumer Engagement Advisory Panel (CEAP) which "provides a valuable and important role in representing the interests of stakeholder groups".

10. To assess the 2026/27 FWP the Panel undertook the following activities:
  - Review of the FWP;
  - Observation of the NIEN Stakeholder Event on 20 November 2025 (three Panel members);
  - Review of the Perceptive Insight report - NIE Networks EPF Forward Work Plan Stakeholder Feedback, Key findings draft report, December 2025;
  - Discussion with NIEN, provision of answers to Panel questions and presentations on each project a meeting on 15 December 2025;
  - Review of some additional material provided by NIEN by email regarding projects B1, B2 and C2; and
  - Panel meetings and discussions.

Prior to the launch of the FWP, in October 2025, NIEN hosted a 2-day familiarisation/induction session for Panel members where the company provided a range of on-boarding and briefing materials.

For a summary of the Panel scoring methodology based on the UR guidance in Annex V of the RP7 Final Determination (paragraphs 64-66).

#### 4.1. Publication and format of the Forward Work Plan

11. NIEN published the FWP 2026/27 entitled “Transforming Our Business” on 31 October 2025 ([link](#)) and this was followed by a period of consultation closing on 12 December 2025, during which time the company sought written submissions.
12. The Panel Chair was involved in publicising the document and encouraging feedback as part of the company’s social media strategy.
13. The FWP sets out 6 priority projects grouped under 3 themes as follows:

<b>Theme A</b> <b>Improving Customer Connections</b>	<b>Theme B</b> <b>Customer Confidence &amp; Experience</b>	<b>Theme C</b> <b>Supporting the Energy Transition</b>
<p data-bbox="225 1070 625 1173"> <b>Project A1</b>  <b>Flexible connections</b> </p> <ul data-bbox="225 1182 625 1462" style="list-style-type: none"> <li>• Trial projects to develop a framework for connections that provide flexible supply, reducing the need for physical network upgrades.</li> </ul>	<p data-bbox="663 1070 1064 1173"> <b>Project B1</b>  <b>Proactive communications around storms</b> </p> <ul data-bbox="663 1182 1064 1462" style="list-style-type: none"> <li>• Enhancing support for vulnerable customers during storm events by introducing outbound digital communications tools to provide proactive advice and updates, augmenting the current manual call-based system.</li> </ul>	<p data-bbox="1102 1070 1503 1173"> <b>Project C1</b>  <b>Dynamic line rating at scale</b> </p> <ul data-bbox="1102 1182 1503 1462" style="list-style-type: none"> <li>• Dynamic Line Rating uses real-time data from sensors on power lines to adjust the maximum amount of power transported.</li> <li>• Moving from trial to delivery of DLR using drone technology to install sensors safely and efficiently.</li> </ul>
<p data-bbox="225 1489 625 1592"> <b>Project A2</b>  <b>Enhancing customer connections</b> </p> <p data-bbox="225 1601 625 1659">Digital service enhancements including:</p> <ul data-bbox="225 1668 625 1877" style="list-style-type: none"> <li>• ‘How to’ videos</li> <li>• Dedicated digital communication channels for connections</li> <li>• Dedicated support roles for connections queries within the NIEN contact centre.</li> </ul>	<p data-bbox="663 1489 1064 1592"> <b>Project B2</b>  <b>Deploying generation as we rebuild the HV network</b> </p> <ul data-bbox="663 1601 1064 1877" style="list-style-type: none"> <li>• Trial deployment of temporary electricity generation to keep customers on supply and improve efficiency while the 11kV network is rebuilt.</li> </ul>	<p data-bbox="1102 1489 1503 1592"> <b>Project C2</b>  <b>Green skills action plan</b> </p> <ul data-bbox="1102 1601 1503 1877" style="list-style-type: none"> <li>• Leading the first coordinated, cross-sectoral approach to green skills in NI. Assisting in the NI Executive to create good jobs, raise productivity, and decarbonise the economy.</li> </ul>

Figure 1: Overview of the FWP 2026/27 themes and projects

14. The Plan included a commentary on why NIEN believes each theme matters along with its intended impact and the company's self assessment of how each project/initiative contributes to each of the 4 NIEN roles set out in the EPF, as well as a wider societal role. It also included the company's assessment of how each project aligns to its own corporate strategic objectives - Meeting NI Energy Needs, Developing a Sustainable Network and Transforming our Business - and scores each project in terms of how well it meets previously identified stakeholder priorities. These 5 priorities were established following a stakeholder research exercise conducted between June and August 2025 by Reputation Inc and are as follows:

- Enable the Energy Transition
- Accelerate Investment in Grid Infrastructure
- Improve Customer and Stakeholder Engagement
- Deliver Fast and Fairer Connections
- Demonstrate Industry Leadership and Innovation

15. Following the Panel's meeting on 15 December 2025, and having reflected on Panel feedback regarding the company's ability to control the delivery of all aspects of the project due to its dependency on external parties, NIEN decided to withdraw project C2, the Green Skills initiative, from the EPF assessment. The project has been retained within the FWP document to reflect work already underway on a BAU basis and to demonstrate the company's ambition and willingness to adopt a broader leadership role. NIEN indicated that the company intends to continue delivering this activity as part of its ongoing programme and will seek to refine and expand the associated outputs in future years. Although project C2 has been excluded from the EPF evaluation for financial incentive or penalty purposes, the Panel reviewed both the project and the stakeholder feedback received. An assessment is included within this Report (see Section 7), although the project has not been scored.

## **4.2. Stakeholder consultation on the Forward Work Plan**

16. In reviewing the consultation process, the Panel noted that while the stakeholder event on 20 November was well facilitated and provided useful opportunities for discussion, the breadth of participation was relatively limited. Several stakeholder groups that NIEN would ordinarily expect to engage with, such as business bodies, local government, farming and rural organisations, were not represented on the day. It was unclear whether NIEN had undertaken targeted outreach to encourage participation from these groups or to secure written submissions from those unable to attend.

17. The Panel also observed that many attendees had not had sufficient time to review the 57-page FWP in advance of the event, which may have constrained the depth of feedback provided. The absence of an accessible summary or easy-read version of the Plan was raised by stakeholders on the day and is likely to have affected the quality of engagement. Providing concise briefing materials ahead of future events would support more informed and constructive contributions.

18. The Panel noted that NIEN appeared to undertake specific stakeholder engagement for the development of the FWP only for projects A1 and C1, while for the remaining projects the company relied primarily on consultation carried out during the RP7 business plan process and other recent activities. The Panel accepted that this approach was reasonable for the first year, given how recently the RP7 engagement had taken place, but considered that it nonetheless limits the extent to which the FWP reflects fresh or project specific stakeholder insight. The Panel would expect NIEN to consider how best to conduct more targeted engagement for future FWPs.
19. The Panel was concerned by the absence of input from the CEAP. The group did not participate in the stakeholder event due to a scheduling conflict, but it was unclear whether CEAP members had been involved in shaping the FWP or had provided feedback through other channels (there was no mention of the CEAP in the Perceptive Insight report). Given CEAP's intended role within the EPF, the Panel considered this a notable gap in the consultation process.
20. Finally, the Panel thought that the Perceptive Insight report provided helpful qualitative feedback (a summary of stakeholder feedback on each project has been included in the Appendix of this report). The report will be a valuable source of insight for future FWPs for NIEN. However, the limited evidence presented within the FWP itself meant that the Panel often had to infer the extent and quality of stakeholder engagement. For future iterations, the Panel would welcome clearer documentation of engagement activities, including who was consulted, how feedback was gathered, and how it influenced project design.

## 5. Overall commentary on the Forward Work Plan

21. The 2026/27 FWP was the first Plan submitted under the RP7 EPF. The Panel welcomed its publication by the UR's target date of 30 October 2025 and appreciated the clear explanation of context, including the role of the Panel, set out in Chapters 1–5. Given the change in lead personnel for the EPF process during October and November, at the same time the Panel was being established and taken through a familiarisation process, NIEN is to be commended for producing the Plan to a high standard. There is nonetheless scope for significant learning in the Panel's opinion.
22. Although the Plan was comprehensive and well presented, the Panel found it difficult for many readers to navigate. It was unclear whether the document was intended primarily for the EPF process (and therefore the Panel) or for wider stakeholders. Using a "Harvey Balls" style presentation, the Plan assessed each project against the company's three corporate objectives, the four NIEN roles, along with an additional societal role that does not form part of the EPF assessment process. It did not include a comparable assessment against the four UR criteria, which was a requirement for the Panel to evaluate in the EPF.
23. In addition to the various self-assessments above, the Panel noted the inclusion of the stakeholder priority work undertaken by Reputation Inc in Summer 2025, identifying five priorities and applying a similar "Harvey Balls" assessment. While welcoming this as evidence that the company had considered stakeholders views in developing the FWP, the Panel felt this added further complexity and made the document challenging for all but the most informed stakeholders, particularly as the detailed descriptions of the six projects were located only in the appendices. In the Panel's view, the substantive content of the Plan lay in the project detail, and this should have been placed at the forefront rather than following extensive process material. The NIEN assessments against the corporate objectives and roles along with the stakeholder priorities could more usefully have been appended.
24. The Panel welcomed the identification of three key themes – Improving Customer Connections, Customer Confidence and Experience, and Supporting the Energy Transition – but noted that these themes were not introduced or explained, which added to concerns about the accessibility of the document.
25. The fact that the FWP sits outside the RP7 Final Determination and seeks to go beyond BAU was not clearly articulated (aside from a general reference on page 18). What constitutes BAU for each project was a key issue for the Panel and notwithstanding briefings from NIEN leads as part of the familiarisation process in October, only became fully understood during detailed discussions with each project lead in mid-December. Stakeholders reviewing the document will have faced the same challenge.
26. Finally, as noted above the absence of even a short summary document provided in advance for those invited to the 20 November stakeholder event may well have impacted on the feedback as many attendees were really only being briefed on the day about the 6 projects.

## 6. Review of the Six Forward Work Plan projects

27. Overall, the Panel considered this first Forward Work Plan to be a positive start. The document was clearly written and visually well designed. While there are areas for improvement, as set out later in this report, NIEN should take encouragement from the overall grade awarded and build on the foundations established through the 2026/27 Plan.
28. The Panel agreed that the six projects represent a reasonable balance of customer focused and more strategic initiatives, including those aligned with the DSO transition and UR Service Priority. The grouping of projects under three customer facing themes was helpful and reflected many of the issues raised during RP7 engagement (as the FWP noted). The Panel found that the level of ambition varied across the projects: B2 was regarded as ambitious, A1 and C1 were considered ambitious within the Northern Ireland context, B1 attracted mixed views on ambition and A2 was not regarded as particularly ambitious. These views were broadly consistent with stakeholder feedback in the Perceptive Insight report and are reflected in the individual project comments that follow.
29. Stakeholder views were an important part of the Panel's assessment. The feedback in the Perceptive Insight report indicated strong support for most projects, although some stakeholders questioned the feasibility of delivering certain initiatives within a single year (projects A1 and C2). Several stakeholders also commented that elements of projects A2 and B1 should already be standard practice/BAU and therefore they were not viewed as ambitious.
30. The Panel noted that the FWP appeared to have been written primarily with the Panel in mind rather than for wider stakeholders. This was evident with the inclusion of detailed scoring tables that assessed each project against NIEN's corporate objectives, the four NIEN roles and the five stakeholder priorities (but not against the four UR criteria required for scoring). The Panel considered that these tables would have been better placed in an appendix, as they are unlikely to be of interest to most stakeholders and contributed to the complexity of the document.
31. The Panel welcomed the company's efforts to demonstrate alignment with stakeholder priorities and to show how each project contributes to NIEN's strategic objectives. However, the substantive content of the Plan lies in the project descriptions, which were located only in the appendices. In the Panel's view, placing these descriptions earlier in the document would have improved accessibility and clarity.
32. Finally, the Panel recognised that NIEN had sought to balance innovation with deliverability. Several projects represent meaningful progress in the Northern Ireland context, even where similar approaches are already established in other jurisdictions (projects A1, C1 and B2). The Panel acknowledged that this first FWP had been developed at pace, during a period of organisational change, and that NIEN has shown a willingness to learn and adapt. The detailed assessments of each project that follow reflect both the strengths of the proposals and the areas where further development would be beneficial.

## 7. Project specific comments

### A1 – Flexible Connections

33. The Panel considered that the *Flexible Connections* project was an important step in supporting Northern Ireland’s energy transition, particularly in enabling faster and more efficient renewable generation connections. By actively managing network congestion, NIEN aims to offer customers alternatives to traditional reinforcement, reducing or avoiding capital expenditure and significantly accelerating connection timelines, potentially by several years. This aligns strongly with the wider Energy Strategy, including renewable energy targets, green economic growth, and the Net Zero 2050 commitment.
34. There was a consensus that the project was well aligned with the transition to a Distribution System Operator (DSO), making use of smart solutions to facilitate quicker, more efficient network use. Although flexible or non-firm connections are not technically innovative compared with GB or the Republic of Ireland, where ESBN has offered such arrangements for years, they are new in the Northern Ireland context and respond directly to customer demand. NIEN has been engaging actively with large load customers, and early feedback from the Maximum Import Capacity (MIC) trial, including from Translink, has been positive, enabling operational changes to be implemented more quickly and at lower cost.
35. Stakeholder engagement was strong for this project. A call for evidence in summer 2023 received ten supportive responses, and subsequent stakeholder feedback indicated broad agreement that the project was important and timely. Many participants at the stakeholder event welcomed the clarity of the planned trials, the defined timelines, and the measures of success for both MIC and Maximum Export Capacity (MEC) trials. Some stakeholders at the consultation event expressed concern about the pace of delivery and suggested that the trials may need to extend beyond the first year to fully test the approach. There was also recognition that tariff development must keep pace with the trials to ensure long-term viability.
36. The Panel considered that the project would benefit from clearer articulation of environmental and carbon-related impacts, including quantification of avoided reinforcement and the degree of renewable curtailment once flexible connections are in place. Similarly, while NIEN stated that connections could be delivered “years sooner,” no specific metrics or examples are provided. Greater clarity on how many customers will be affected, and on the implications for customers not directly participating in the trials, would strengthen the case further. Some measures of success, such as “successfully run for one year without customer exceedance”, would also benefit from more precise definition.
37. Despite these gaps, the Panel viewed the project as proactive, aligned with regulatory and stakeholder priorities, and likely to support delivery of the Climate Change Act targets, including the 80% renewable electricity ambition by 2030. It is expected to evolve into a broader flexible connections programme, which has not yet been mandated by the UR but is widely seen as necessary. Overall, the project was considered relatively ambitious within the NI context, and proactive ahead of regulatory obligations albeit not technically novel compared with other jurisdictions, and it was generally welcomed as an important enabler of the energy transition.

## A2 – Enhancing Customer Connections

38. The Panel considered that the *Enhancing Customer Connections* project was an important but not particularly ambitious initiative that addresses long-standing issues in NIEN's connection processes. While many of the proposed improvements were considered foundational and should arguably already be part of BAU activity, the project nonetheless represents a significant shift in how NIEN engages with customers and it begins to establish the basis for a more transparent, two directional relationship in future energy service provision.
39. Stakeholders consistently emphasised that faster, clearer, and more responsive connection processes are essential to meeting Northern Ireland's energy and climate targets. With the 80% by 2030 goal already extremely challenging, and with Contracts for Difference (CfD) design assuming a two-year application-to-connection timeframe, any initiative that accelerates connection offers was seen as critical. Slow and opaque connection processes have long been the number-one frustration for developers and customers, a point reinforced through workshops and feedback reports. Many stakeholders at the 20 November event therefore welcomed the project, even if they felt it should already be standard practice. Some stakeholders also raised concerns about how vulnerable customers would continue to be supported as processes become more digital and streamlined.
40. The project introduces several operational reforms intended to improve customer experience and reduce delays. Dedicated teams with improved training and tools are expected to deliver faster and more consistent connection offers. The use of modern communication channels, such as WhatsApp, AI-generated videos, and multiple customer-facing platforms, should help customers submit better-quality applications and navigate the process more easily. While not a major digital innovation initiative, the restructuring of teams and adoption of flexible communication tools were judged by the Panel to represent meaningful improvements in how NIEN interacts with customers. The Panel also noted that these changes could support faster integration of low-carbon technologies and renewable generation and welcomed the clear timelines for activities and measures for success set out in the FWP.
41. However, the project's ambition was limited by several gaps. The Panel considered that while KPIs were included, their relevance to the four NIEN outcomes was not clearly explained. There was also no quantification of environmental or carbon-related impacts, despite claims that the project will reduce carbon footprints and support low-carbon technology adoption. The absence of sustainability metrics weakens the strategic case.
42. Overall, the Panel's view was that *Enhancing Customer Connections* was a valuable customer-facing project that addresses core customer frustrations and supports the wider energy transition. Although not particularly innovative or ambitious, it is expected to deliver meaningful improvements in transparency, responsiveness, and connection timelines. These improvements will help accelerate progress toward Net Zero and improve customer confidence in NIEN's role in enabling future energy services.

## ***B1 – Proactive Communication around Storms***

43. The Panel considered that the *Proactive Communication Around Storms* project was a valuable step-change initiative with strong potential to improve customer experience during severe weather events. As climate-related incidents become more frequent and intense, proactive communication is increasingly important, and successful delivery will require close collaboration with communities, charities, vulnerability partners, and supply-chain organisations.
44. The Panel agreed that the project represents a significant step change from current practice and was more stretching than many existing customer-service initiatives. It aligns well with UR priorities around customer protection, responsiveness, and service quality, though its links to the Climate Change Act and the wider Energy Strategy are less explicit, aside from a general contribution to system resilience. Alignment with the DSO transition was minimal, as the project focuses primarily on communication rather than system operation, although the Panel recognises that not every project can score highly against every role.
45. The Panel welcomed the introduction of new outbound messaging, particularly for vulnerable customers, and the fact that it makes innovative use of existing systems and modern communication channels. These improvements are expected to reduce pressure on call centres during storms, enabling operational staff to focus on fault repair rather than managing customer communications. This should improve overall satisfaction and help customers make informed arrangements during outages. While the project will likely be neutral in terms of direct climate impact, there was a recognition that increased digitalisation may support more flexible working.
46. Stakeholder engagement has informed the project design, with input from charities, partners, and customers. Feedback on ambition at the stakeholder event was mixed: some stakeholders felt proactive storm communication should already be standard practice, while others recognised the complexity and context-specific nature of storm response. Many also praised NIEN's existing storm-response capability, noting that this project builds on a strong foundation. Stakeholders also emphasised the need for NIEN to ensure that communication tools remain current, given the rapid pace of technological change.
47. The Panel considered that the planned initiatives were clearly described, and the proposed KPIs appear sensible. However, the absence of quantified targets and the lack of clear linkage to the four NIE Network roles (a requirement of the UR guidance) limited the Panel's rating in relation to ambition. Measures such as "increased satisfaction" or "positive feedback" need clearer definitions to support meaningful performance reporting.
48. Although the project does not include sustainability metrics and the stated environmental benefits are vague, the Panel accepted that it directly improves service for vulnerable customers and strengthens NIEN's ability to manage customer expectations during severe weather. Overall, the Panel welcomed the project as positive enhancement to NIEN's storm-response capability, even if some elements reflect standard industry practice elsewhere.

## ***B2 – Deploying Generation as we Rebuild the HV Network***

49. The Panel considered that the *Deploying Generation as We Rebuild the HV Network* project was a strong initiative that will safeguard customer service during extensive network rebuilds. It offers a valuable opportunity to engage with stakeholders and respond directly to concerns raised during RP7 consultations, particularly around the increasing dependence of homes and businesses on reliable electricity.
50. Across all Panel members' assessments, the project was recognised as being well aligned with the Climate Change Act and Energy Strategy, given that line upgrades are essential for the energy transition. The initiative is expected to significantly reduce customer minutes lost (CML) and customer interruptions (CMI), which are central measures of service quality. Stakeholder support has been strong, with feedback from workshops and events indicating that the project was both welcome and timely, especially in the context of widespread rebuild work planned under RP7 and the rise in home-working patterns. Stakeholders at the 20 November event also generally considered the project to be achievable within the proposed timeframe.
51. The Panel felt that the project plan was clear and included defined KPIs, although the absence of specific targets, may make it difficult to assess success. The information shared relating to BAU comparative performance was notable but more financial information could have strengthened the cost–benefit analysis and return-on-investment case.
52. The Panel considered that the project demonstrated an innovative approach. While generators are commonly used during fault repairs, the proposed method of deploying generation during planned rebuilds represents a significant shift in practice for NIEN. Northern Ireland's limited back-feed options create a unique context that makes this innovation particularly valuable. There is potential for reduced material wastage, such as more efficient use of conductor drums. Customer satisfaction, both qualitative and measured through reductions in CML and CMI, is positioned as central to the initiative's ambition.
53. Recognising that not every project can score against every role, the Panel noted that B2 does not strongly align with the DSO transition role, apart from its contribution under the stakeholder engagement criteria. While the ambition to replace diesel with HVO or other low-carbon fuels was acknowledged, Panel members expressed mixed views on sustainability, noting that early phases may be carbon neutral at best and could initially increase emissions. The Panel would have welcomed clearer environmental targets, including quantified carbon-saving metrics, and noted NIEN's stated willingness to procure more sustainable generation options over time.
54. Overall, the Panel felt that the project could be highly beneficial for both residential and business customers, particularly in rural areas where outage reductions could deliver meaningful financial and operational advantages.

## C1 – Dynamic Line Rating at Scale

55. The Panel considered that the *Dynamic Line Rating(DLR) at Scale* project presents a clear pathway to improving service quality by enhancing visibility of network performance and enabling more efficient use of existing infrastructure. It has the potential to reduce future operational and maintenance costs and to significantly decrease curtailment of renewable generation. By maximising the capacity of the current network, DLR supports the Climate Change Act, the Department for the Economy’s objectives, and the Energy Strategy, while also reducing the need for new network build and associated material use.
56. A key feature of the proposal was the deployment of sensors using drones. While some stakeholders at the 20 November event argued that drone technology is not new and therefore not ambitious, others noted that drones have not previously been used in this way in Northern Ireland (or indeed elsewhere other than in trials), particularly for installing sensors on live lines, and the Panel agreed, noting that if successful, this would represent a highly innovative approach with clear safety and operational benefits. Drone deployment is expected to accelerate rollout significantly compared with traditional methods, and funding in RP7 did not previously cover this activity.
57. Stakeholder engagement appears strong, with evidence of discussions involving NI Renewables and several developers and feedback indicated broad support, particularly from renewable industry representatives who recognise the project’s potential to reduce curtailment costs and improve generator returns. Generation customers should see reduced curtailment and associated costs thus benefiting all customers by reduced pass-through charges.
58. The Panel’s view was that the project offers substantial benefits for both the DSO and TSO. For the DSO, DLR is an essential tool for maximising the efficiency of the existing network. For the TSO, it provides a valuable means of reducing system constraints and associated payments. International experience, such as in Switzerland, suggests that widespread deployment could reduce interruptions and improve system resilience. However, as this proposal funds only a single trial, the wider benefits have not yet been quantified, and further KPIs may be required if the project transitions to BAU. If more than one trial is needed, the Panel noted that SONI may require additional funding to support constraint reduction. The Panel welcomed the fact that the project’s KPIs are clear and simple, though they are not currently linked to the four NIE Network outcomes, which is required for an “exceeds” rating. Scalability potential is strong, and the co-dependency with SONI is noted, though it is unclear whether this presents a barrier to delivery.
59. Overall, DLR at scale was viewed by the Panel as an important, innovative, and achievable project with strong alignment to strategic priorities, clear stakeholder support, and meaningful benefits for customers, renewable generators, and the wider system.

## **C2 – Green Skills Action Plan (withdrawn from the EPF evaluation)**

60. The Panel recognises the *Green Skills Action Plan* as an important and potentially transformative initiative, particularly for supporting the Climate Change Act, the Energy Strategy, and Northern Ireland’s wider transition to Net Zero. If developed with more detailed planning and clearer alignment to business unit needs, it could demonstrate strong local wealth creation and contribute to workforce resilience, helping safeguard essential services.
61. The Panel felt that the project was ambitious, but perhaps overly so in its current form. A more focused plan with fewer, well-targeted outcomes may be more credible and deliverable. While the Forward Work Plan outlines actions, it lacks clear deliverables and timescales, making it difficult to assess progress.
62. Stakeholder engagement was a strength of this project, with a broad and representative group involved and robust consultation reported. However, because the process documentation does not fully evidence the quality of engagement, the Panel had to give the benefit of the doubt on what the company reported. Stakeholders at the 20 November event seemed to view the project as important and ambitious but acknowledged that benefits, particularly job creation and workforce upskilling, would take time to materialise. A recurring theme they raised was the significant skills capacity and capability gaps across infrastructure sectors, especially in green skills. A more joined-up approach was seen as innovative and necessary for a successful Net Zero transition. From a societal perspective, the focus on developing green jobs was viewed as a major sustainability benefit. While the long-term impact on customer service was acknowledged, through better-trained staff with stronger technical knowledge, these benefits will take time to emerge.
63. While highlighting the company’s convening power and commending the project and the leadership role that NIEN is willing to play, the Panel did question the direct service benefits to NIEN, noting that the project’s value appears more clearly aligned with the wider Northern Ireland economy and society than with NIEN’s core operations. There was also uncertainty about how NIEN can differentiate its role, demonstrate leadership, and articulate the specific benefits it will realise. While NIEN was seen as going beyond what is traditionally expected of it, the innovation may lie less in NIEN’s actions and more in the skills and resources the initiative ultimately produces. Arguably, funding support for the project should come from many of the key stakeholders, particularly the government departments whose strategic objectives will be supported by NIEN driving this initiative.
64. Overall, the Green Skills Action Plan was viewed as an ambitious, collaborative, and strategically important project that addresses critical workforce gaps and supports Northern Ireland’s transition to Net Zero. Its success will depend on clearer scoping, stronger articulation of NIEN’s role and benefits, realistic timelines, and sustained cross-sector collaboration.

## 8. Grading of the Forward Work Plan

65. In the EPF Guidance, the UR provided the Panel with a complex albeit mechanistic methodology for arriving at an overall assessment grade. This involves attributing a score for how each of the 4 UR criterion was met in each of the 4 NIEN 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. In practice, this involved each Panel member using a matrix for 4 roles and 4 criteria for 5 projects before assigning scores and populating an overall scoring spreadsheet provided by the UR.

66. Each Panel member separately undertook the assessment in advance of a meeting of the Panel on 8 January 2026. During that meeting, the Panel reviewed evidence submitted by stakeholders, revisited individual scoring where appropriate and agreed their scores for each criterion and role, which were then averaged. The agreed Panel scores were then fed into a calculation spreadsheet provided by the UR, which calculated the aggregate score, assessment grade and overall grade for the Plan using the EPF Guidance grading methodology (paragraphs 4.9-4.17).

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

<b><u>Forward Plan</u></b>				
<b>NIE Networks Roles</b>	<b>DSO Transition &amp; Whole System Collaboration</b>	<b>Innovation</b>	<b>Sustainability</b>	<b>Customer Service Quality</b>
<b>Role Weightings</b>	25.0%	25.0%	25.0%	25.0%
Service Ambition	1.0	1.0	1.0	1.0
UR Service Priority etc	1.0	1.0	1.0	1.0
Stakeholder Engagement	1.0	0.0	0.0	0.0
Service Accountability	0.0	0.0	0.0	0.0
<b>Aggregate Score</b>	<b>4.0</b>	<b>3.0</b>	<b>3.0</b>	<b>3.0</b>
<b>Assesment Grade</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>
<b>Overall Grade</b>		<b>5.00</b>		

Table A: The EPF Panel's scoring of the FWP 2026/27

## 8.1. Commentary on the Grading

68. The Panel's grading reflected a balance between ambition and deliverability. Projects that combined clear, measurable outcomes with credible delivery plans and demonstrable stakeholder support received higher grades. Projects with weak or absent targets, limited project specific engagement, or significant external dependencies received lower grades.
69. Several recurring strengths supported higher scoring: clear alignment with NIEN strategic objectives, well defined milestones and timelines, and sensible metrics where provided. Projects that addressed pressing customer needs or system vulnerabilities and that had visible stakeholder backing tended to score well.
70. Common weaknesses reduced scores across a number of projects. These included limited quantification of environmental or carbon impacts, the absence of specific targets/metrics, not linking KPI's to NIEN outcomes (as per UR guidance) and lower ambition projects that stakeholders felt should arguably already be part of BAU activity.
71. For Stakeholder Engagement, as previously mentioned, the Panel found scoring more challenging because the FWP contained only a high-level summary of engagement activities. On balance the Panel judged stakeholder engagement for most projects to 'meet expectations', with A1 and C1 rated as 'exceeding expectations' owing to the additional, project-specific engagement described in the FWP. Much of the wider stakeholder feedback had to be inferred from the Perceptive Insight analysis and other summary material rather than from direct evidence of who was consulted or how responses shaped project design; accordingly the Panel generally gave the benefit of the doubt when scoring, particularly in light of the extensive RP7 consultation carried out in 2024/25.
72. The Panel sought to apply grades consistently by referencing the same evidence types and criteria for each project. Where projects differed in nature, the Panel adjusted emphasis between ambition and deliverability to reflect project type, while maintaining a common assessment framework. The Panel was mindful of the first year context and the need to encourage learning, but grades were awarded on the basis of the evidence available at the time.
73. The grading produced clear signals about where NIEN should focus improvement. Higher graded projects tended to have clearer success measures, stronger stakeholder engagement and more developed delivery plans. Lower graded projects commonly lacked clear targets, articulation of environmental benefits and plans to manage external dependencies.
74. Overall, the grading reflected a pragmatic assessment of ambition, deliverability and stakeholder alignment. It recognised innovation where appropriate, while identifying where further development was required to give the UR and stakeholders confidence in likely delivery and impact.

## 9. Guidance for the Development of Future Forward Work Plans

75. The Panel has noted above a number of shortcomings with the published FWP, particularly in paragraphs 21-26 and in Section 7, including the need for clear metrics and deliverables, improved evidence of stakeholder engagement and feedback and better alignment of outcomes with the UR guidance. It also considered that the enhanced level of detail in the presentations from NIEN project leads on 15 December 2025 was essential to fill important gaps in the overall FWP briefing document.
76. There were also a number of issues where the Panel feels greater clarity from the UR would be helpful particularly around the grading process and timing.
77. In order to maximise learning from this first FWP under the RP7 Evaluative Performance Framework the independent Panel proposes to meet with both NIEN and the UR after the regulatory decisions for FWP 2026/7 have been completed.


## 10. Closing comments

In signing off this report I again want to acknowledge the positive approach and willingness to listen and reflect demonstrated by the company throughout this first EPF Panel evaluation process. NIEN clearly understands the important role that it plays in Northern Ireland's economy and society and challenges itself to deliver an ever better service to its customers and society more generally.

As Chair, I also want to thank my fellow panel members for their knowledgeable, enthusiastic and tenacious approach to what was a challenging task between November 2025 and mid January 2026.

Finally, the Panel is conscious that this report is published by the UR on its website and is interested in any comments/feedback from those reading it that might be helpful to it and NIEN in developing future Forward Work Plans.

Please send any comments to the Panel directly at: [epf.panel@nienetworks.co.uk](mailto:epf.panel@nienetworks.co.uk)



**JENNY PYPER, EPF Panel Chair**

20 January 2026

## Appendix – Summary of stakeholder comments

Summary of stakeholder comments on projects from the Perceptive Insight Report:

Project	Level of ambition	Summary of project comments
<b>A1 - Flexible Connections Trials</b>	A lot of encouragement but some risk concerns over the year timeline	Most stakeholders welcomed this project and felt it was important. Some suggested it might need to be extended beyond the first year, as trials would take time to test. Overall, participants felt this project was ambitious and had concerns over the timeline but hoped it would be extended until implemented and not abandoned after year one.
<b>A2 - Enhancing the Customer Journey</b>	Important but less ambitious, some suggesting should already be happening	Many stakeholders suggested that these improvements should already be happening and foundational to NIE support. For that reason, A2 was welcomed and seen as important but not overly ambitious
<b>B1 - Proactive Communications Around Storms</b>	Important but less ambitious, some suggesting should already be happening	Stakeholders had mixed views on the level of ambition for this project. While some commented that it was an overstated issue or something that should already be happening, others felt that it was complex and context specific. Some stakeholders praised NIE Networks for their existing storm response strategies
<b>B2 - Deploying Generation During HV Rebuilds</b>	Pitched at the right level	It was widely considered by those who discussed B2, that this project was needed and most likely achievable within the year. One group did suggest that the timeline might need to be extended (similar to A1).
<b>C1 - Dynamic Line Rating at Scale</b>	Pitched at the right level	It was widely considered by those who discussed C1, that this project was important and most likely achievable within the year. However, one participant was critical of the level of ambition and suggested that drone technology should already be utilised.
<b>C2 - Green Skills Action Plan</b>	A lot of encouragement but some risk concerns over the year timeline	Similar to A1, stakeholders felt this project was important and ambitious but would take time to materialise. In particular stakeholders mentioned job creation and the upskilling of the workforce to take on green jobs as being time consuming. Concern over NI's 'brain drain' was also raised. Nevertheless, it was a welcome initiative.