

SONI Evaluative Performance Framework
Evaluation Report to UR of the EPF Expert Panel
Assessment of SONI End Year Performance Report
1 October 2024 to 30 September 2025

Abbreviations

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 2027) 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 End Year Performance Report.

The Panel's instructions are to assess the material in the Performance Report, and to consider 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 2024 to 30 September 2025.

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

Panel Assessment Process

Review of Performance Report

The Panel followed the detailed guidance issued by UR in reviewing and evaluating the Performance Report.

This involved applying the following criteria:

- Delivery
- Stakeholder Satisfaction
- Adaptability

to the assessment of the actions and outcomes that the Report 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

Although not fully in place at the beginning of this reporting period, the SONI strategy has had a beneficial impact during the year. The Performance report highlights for each role where the various activities support and align with the SONI strategy. This is not a requirement of the EPF Framework but is a welcome and helpful development in understanding the strategic context of the various workstreams.

Review of Submissions by Stakeholders on the Performance Report

SONI published the Performance Report 2024/25 on 18 December 2025, and this was followed by a period of consultation during which UR sought written submissions. Three written submissions were received from Energia, FERA and iPower. These were 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 provided valuable additional clarifications and information post the Stakeholder meeting. It is worth noting that due to the Panel's targeted questions both before and at the Stakeholder Day, and the provision of additional and helpful

information by SONI, a more comprehensive assessment of the Performance Record over the year was possible.

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 24 February 2026.

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, UR and the Panel, SONI provided additional, 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. As usual these presentations were very helpful in adding to the Panel's knowledge of the factors influencing the outcomes in the Performance Report. The Panel asked questions based on the Report 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 the 2024/25 Performance Report – General Commentary

- This is the third Performance Report submitted under the EPF. The Report continues to evolve positively year on year in response to feedback from the EPF Panel, the UR, direct stakeholder feedback and the efforts of SONI in taking on board constructive input from a range of sources.
- This year SONI have adopted a different format for presentation of the Performance Report, which mirrors that of the 2025/26 Forward Work Plan. The Panel has previously noted that this is a positive and welcome development which makes the Performance Report more accessible and aligned with both the SONI Strategy (which was finalised after the 2024/25 FWP was published) and the parameters of the EPF. The document is visually pleasing coordinated and clear, with links and cross dependencies clearly explained. There is a good use of graphics throughout the Report to illustrate complex issues. The relationship between the various SONI activities and the framework of the EPF is also clear.
- SONI continues to make overall progress across the areas of the Evaluative Performance Framework in both outcomes and the way in which these are reported/presented. SONI have noted that this Report marks a transitional phase, whereby there is now a clear delineation of activities which fall under the ambit of the EPF. It is expected that this refined focus will result in further enhancements for the next Performance Report

- SONI continues to demonstrate a high level of professional effort, technical competence, and organisational commitment in operating and developing the electricity system during a period of significant complexity and transition. However, the Report (as in previous years) remains heavily weighted towards narrative and activity-based reporting, with little in the way of quantified evidence of impact, value-for-money, and overall optimisation. The lack of quantification and the lack of differentiation between activity completed vs benefit delivered limits the ability of the Panel to robustly assess whether genuine effort and investment are translating effectively into measurable benefits for consumers and the system. To allow SONI and the EPF to more effectively support the aims of the Framework, future reporting must move decisively from describing activity to demonstrating numerical outcomes and measurable learning.
- SONI continues to demonstrate a genuine commitment to engagement with stakeholders and incorporation of relevant feedback into its planning and operational processes. The special section in the Report highlighting activities in this area is helpful and the use of specific examples shows the effort that SONI is putting into this area of its activities.
- The Section on Overall Performance is a welcome addition and allows the reader to assimilate the high-level outcomes easily and across the relevant SONI activities – on a qualitative basis. The section describes performance through narrative and explanation rather than demonstration of quantifiable impact and delivery of value to consumers. Moving forward, SONI should consider integrating quantitative metrics in this section to demonstrate benefits and value to consumers.
- SONI note that of the thirteen milestones not completed, all were outside of its direct control. This is accepted. However, the organisational learning, knowledge capture and organisational adaptability to better mitigate future occurrences of unexpected partner/third party shortfalls is a core process to ensure better outcomes for stakeholders. It is simply not enough to state “A key insight is that milestones should focus on what is within our ability to control, rather than external factors.” This *does not* mean that SONI can simply ignore external factors. They may not be under SONI’s direct control but the ability to anticipate, plan accordingly and respond more effectively to external factors is a key determinant in mitigating their potential impact. SONI make a high-level reference to capturing this knowledge. However, without more specific information it is difficult to understand exactly how this aspiration translates into practical actions/enhanced outcomes for stakeholders.
- Projects will always encounter unplanned for challenges. The key element of focus for the EPF is how SONI both prepares for and responds to these challenges, whilst incorporating relevant learning experience, to ensure the best outcomes for stakeholders. The information provided in the performance report suggests that in some instances issues with projects may have been identifiable/anticipated at an earlier stage.

- Multi-year projects and “re-baselining” continue to be difficult to fully evaluate against the framework, (and importantly, overall strategic objectives) given the information available in the report.
- Throughout the Performance Report there is limited distinction between an “output” being delivered and the desired outcome being achieved (they are not necessarily the same). There is little quantitative information on: Measurable impact; Delivered value to the consumer; System benefit. Developing these measures would take the reporting of performance to the next level.
- Panel concerns on several long-standing issues have been responded to by SONI, and whilst helpful and informative, the responses do not completely meet all those concerns. The responses move the remaining issues forwards and will be an area for further development. The Panel have noted in the main body of the Report those areas which would benefit from additional enhancement.

Strategy, Energy Policy and Targets

Northern Ireland has an Energy Policy. This in turn contains strategic ambitions and targets. SONI have recently completed and implemented their own new Strategy which, *inter alia*, supports the ambitions for the Northern Ireland energy landscape.

The Performance Report provides evidence on SONI’s activities relating to decarbonisation ambitions on a project basis. That performance is further measured against “within year” metrics.

The Panel have noted elsewhere that the reporting of multi-year projects could be enhanced. However, there are other issues which are relevant.

Given the targeted and pressing time-bound ambitions of the decarbonisation initiative it would be useful to understand the way in which the suite of projects which are undertaken are holistically managed and reviewed on a cross enterprise, multi-year basis.

A change in the timetable of a single project is unlikely to have an impact which is solely confined to its own specific outcomes. As an example, a relatively small but *enabling* project might have a significant impact on one or more major endeavours. If this is reported using a “silo” system, the interdependencies will not be evident and possibly not acted upon. Given finite resources, it is also unclear how SONI assess, prioritise and dynamically manage projects which vary in scope, scale, delivery challenges and time to achieve the best outcomes for consumers whilst maximising progress towards specific time bounded targets, Stakeholders need to be able to understand how each Performance Report delivers (or falls short) against *the progress required* to achieve longer term (but still *specified*) Objectives.

As an example of important considerations which are currently difficult to determine from the current reporting format, there is no way of assessing whether a reduction

in the number of projects might bring more overall progress/greater value or conversely, whether an incremental increase in SONI resources would provide significant leverage and increased delivery/value.

Activity vs Value Delivered

- The CEO Foreword references that 72% of milestones (33 out of 46) were achieved. Milestones are important steps within delivery. However, they do not represent outcomes or tangible benefits. We suggest that the Foreword provides an ideal opportunity to present quantifiable impacts/benefits/savings (even at a high level) for stakeholders. This translation of activity into quantifiable benefit would be a major addition to the Performance Report.
- SONI continues to demonstrate a high level of professional effort, technical competence, and organisational commitment in operating and developing the electricity system during a period of significant complexity and transition. However, the issue of quantifiable benefit identified above is also reflected throughout the body of the Performance Report. It continues to be focussed on narrative and activity-based reporting, with very little in the way of quantified evidence of benefit/impact, value-for-money, and delivery confidence. This necessarily means that performance evaluation is limited by the lack of “hard” numerical metrics. The absence of quantification and the consequent difficulties in differentiating *activity* completed vs *benefits* delivered limits the ability of the Panel to determine whether effort and investment are translating effectively into measurable benefits for consumers and the system. This is a fundamental objective of the EPF process, to deliver tangible, quantifiable benefits for stakeholders. To support effective regulatory assurance, future reporting must move from *describing* activity to *quantifying* outcomes and learning benefits.
- Such a move would provide significant benefits and assurance for stakeholders. Importantly, it would also allow SONI to easily demonstrate the significant value that it delivers to stakeholders with much greater impact than the current format. Quantification also allows business cases to be built more readily for further value adding/benefit delivering activities. We return to this point regarding Cost/Benefit – Projected and Realised, below.

- Across the report, success is primarily evidenced by:
 - Deliverables completed
 - Studies published
 - Processes implemented
 - Engagements undertaken

There is limited evidence that these activities have resulted in *measurable* benefits, such as:

- Reduced cost or risk
- Improved delivery timelines
- Enhanced consumer outcomes

Effectively addressing the linkage between activity and quantifiable benefit would address a major shortfall in the report.

Role 1 necessarily provides the larger source of data. However, across the Report there is:

- Minimal use of targets or benchmarks
- Limited *specific* attribution between projects and outcomes
- Very few quantified measures of consumer or system benefit

This constrains accountability and value-for-money assurance.

- There is a singular reliance on external dependencies to explain non-delivery: Projects not fully delivered are frequently attributed to:
 - Policy evolution
 - SEM governance
 - Third-party timelines

Whilst these factors will play a part, many of these dependencies were known at plan approval, and the report provides limited evidence of SONI responding by:

- Mitigation
- Contingency planning
- Learning/feedback and the development of more prudent assumptions

SONI *have* these organisational capabilities. The lack of information on how they were leveraged to provide improved outcomes does not allow a high degree of confidence regarding their actual application.

- Cost Benefit – Projected and Realised:

Investment in:

- Organisational capability
- Systems and tools
- Processes and frameworks

is clearly described, but there is limited specific numerical evidence that these investments have:

- Improved delivery performance

- Reduced delays
- Delivered efficiency or cost savings

As a result, return on investment is largely assumed rather than demonstrated. There is also no opportunity to assess whether the post project review process within SONI functions effectively in delivering improved future projects.

SONI highlight the major operational challenges faced in the past year and the steps taken to successfully meet these. SONI deserve significant recognition for their performance in this area and meeting those challenges successfully.

Such issues might be expected to fall within the prudent business and operational planning processes of a competent and experienced TSO such as SONI and, importantly, be addressed through the core regulatory framework. Whilst these “unparalleled operational challenges” are acknowledged, the EPF framework is not primarily focussed on “core business” activities (even low probability ones) and it is the consequential impact on those activities which fall within the EPF framework, which is the focus of evaluation – whilst recognising the reasons for any impact.

The Panel have commented extensively in the past on the subject of imperfections costs. SONI provided a comprehensive review of the issue at the Stakeholder day on 24 February 2026, which highlighted the complexity of the issues involved and SONI’s approach to resolving them at least cost whilst maintaining the required security and quality of supply standards. The Panel understand that SONI is faced with a multivariable problem to solve which is constantly “reset” due to developments on the operational network and that the outcomes represent “the best available solution” to resolve constraints - and hence the resultant level of imperfections costs.

Given the above, it is for consideration whether the use of a metric which is effectively outside of SONI’s direct control provides a useful input to the EPF. We suggest that consideration be given to the development of a more tractable and user-friendly measure of “system operation efficiency” such that the individual cost components of system operational policies, investment decisions and strategic ambitions can be clearly defined and allocated. This is not simply to “minimise costs” but to allow stakeholders to understand the various complex trade-offs and resultant costs of the *policy decisions taken* on the operational envelope as the system changes and develops.

The EPF operates on evidence and input from SONI and other stakeholders. As a Panel we are bound by the need to assess the various stages of the EPF on what we are presented with. SONI provide information via formal reports, formal presentations and written answers to clarificatory questions. The individual detail of this information is important. Where it is insufficiently detailed to allow the Panel to take a fully informed view, the framework precludes us from making assumptions (favourable or unfavourable) or using submitted high level statements/assurances in reaching any conclusions.

We value the submissions from stakeholders. Given the importance of SONI in delivering the NI Energy Strategy it is again disappointing that more stakeholders did not provide a written input to the evaluation process. It is difficult to ascertain the reasons for this. A favourable view might be that stakeholders consider that any concerns have already been met via other channels. Unfortunately, we have no evidence to either confirm or deny this possibility.

Provision of Information

For each formal submission, SONI provide a written input (Plan/Report) which demonstrates the considerable effort put into its activities across the range of roles and responsibilities. The Panel routinely ask follow-up questions to allow additional information to be brought forward or clarification of certain issues to be achieved. SONI consistently provide answers which allow a more informed evaluation to take place.

SONI provide useful additional information when requested, which goes beyond the basic requirements of the EPF Framework and demonstrates their positive commitment to engagement.

At the various Stakeholder days, either more focussed detailed presentations or information on initiatives which cut across the range of SONI's activities inevitably provide deeper insights and perspectives which allow the Panel to more fully assess the associated Reports. We have noted before that whilst this sequence does allow the Panel the fullest suite of information possible for evaluation, there are opportunities for SONI to incorporate some elements of the additional information at an earlier stage in the relevant Report/Plan. This would allow both parties to focus on clarification (if needed) rather than substantive issues, at the later stages of the process.

SONI's presentations at the Stakeholder day on 24 February continued the theme of providing insightful additional perspectives on its work throughout the year. In particular, the presentations on the two additional projects served to illustrate how SONI had successfully met significant unexpected challenges over the period. The session was completed by valuable presentations on the Firm Access Review, Scheduling and Dispatch Project SDP02 and a fundamental exploration of the parameters, tools and limitations of imperfection cost management.

The Panel would like to express its gratitude to SONI for providing a significant piece of additional analysis following the stakeholder session and questions asked by the Panel.

This analysis clearly demonstrates that the benefit associated with SDP-02 ESPS integration is substantial. An estimated saving of at least £200k per hour during peak periods, equating to approximately £73m annually - based on one hour per day,

represents substantial value for consumers. Notably, this conservative estimate already exceeds the entire SDP programme budget of ~£60m.

The panel recognises that this represents a very significant saving that was not reflected in the annual Performance Report – although it has been delivered through SONI’s endeavours during the period. SONI may wish to consider how future Performance reports can integrate similar quantified consumer benefits associated with its delivered projects. The increased use of cost/benefit data would provide a more complete and balanced view of the work programme’s overall impact and the scale and scope of the value being delivered.

Independent Expert

As the scope and scale of SONI’s activities in this area increase, it is worth considering whether any further formalisation of its responsibilities may be beneficial, particularly regarding its role as a trusted advisor to the DfE in providing expertise and strategic advice.

Strategy

The new SONI Strategy was finalised and implemented during the period covered by the Performance Report. As such, the implications of the strategy are necessarily not fully discernible from the Report (although high level “alignment is noted for each section). This is to be expected in a “transitional” year. For future Performance reports, it would be valuable to map the progress made each year not only against period specific goals but also those of the overall strategy (rather than simply the four strategic “pillars”). This would allow stakeholders to have a high-level appreciation of the progress being made, what the strategic challenges were and their potential impact, together with SONI’s initiatives to ensure that deliverability was maximised via adaptability and innovation across the strategic and operational landscapes. This would also serve to address both the Panel and stakeholders repeated request for performance “snapshots” to be placed in the context of overall time bounded objectives. (e.g. where individual projects are rescope or re-baselined within year)

The Panel notes that SONI have *initiated* this process in the associated Forward Work Plan with the mapping of all projects explicitly to SONI’s four outcomes and strategic pillars. As we note above, the provision of hard metrics would provide additional value.

Stakeholder Engagement

The section on Engagement Evaluation is another welcome development. This reflects SONI’s commitment to report on progress and delivery against the Annual Stakeholder Engagement Action Plans. The engagement framework and dashboard

represent a positive structural development. It is further underpinned by SONI's ambition to maintain or improve upon the stakeholder satisfaction benchmark established in 2023/24. This they achieved with a 15-percentage point increase in their chosen metric. In turn this improvement can be seen as reflecting SONI's commitments to building trust, strengthening relationships and delivering high-quality, meaningful engagement.

Overall stakeholder satisfaction metrics (including the "Pulse" survey) are usefully supported by SONI's post engagement surveys which provide a "next level" amount of detail on its engagement activities. SONI should be commended for developing this initiative from a pilot in 2023/24 into a core measure of stakeholder satisfaction across its suite of activities. The development of a quantitative engagement baseline, seen in the Performance Report for the first time, is very welcome. The Panel also notes that SONI have secured external recognition for its activities, and this should be recognised.

The specific information regarding Digital and Media Engagement also serves to illuminate the comprehensive approach being taken by SONI to its engagement activities.

There is clear evidence that SONI has:

- Moved beyond ad hoc engagement reporting
- Developed a formal framework with defined dimensions (reach, quality, responsiveness, learning)
- Introduced repeatable processes and dashboards

This is a genuine step forward and should be acknowledged.

The detailed information presented on specific high profile case studies provides a high degree of confidence that the ambitions of the overall engagement programme are being translated into effective outcomes.

There is no doubt of the effort that SONI are putting into their stakeholder engagement activities and qualitative evidence that its effectiveness is increasing. However, there is as yet no fully structured measure for Engagement Effectiveness.

While engagement activity is extensive and increasingly structured:

- Metrics are largely activity-based
- Satisfaction targets lack ambition and clarity
- There is only partial evidence (for some projects) that engagement has materially influenced decisions or outcomes

What is largely absent is: Measures of engagement effectiveness; consistent evidence of positive influence on decision processes; demonstrable changes to project plans or outcomes as a result of engagement. A significant step forward

would be the ability to translate the considerable engagement activity into tractable measures of engagement impact. These would be expected to include:

- Beneficial project changes
- Delivery improvements
- Risk reduction
- Improved timelines
- Enhanced consumer outcomes

This limits the ability to discern whether engagement is delivering additional value beyond “compliance”.

There are gaps in how SONI uses engagement data to measure impact or demonstrate how this important information is used to influence decisions. Importantly, there is no engagement driven figure to capture benefit to consumers, which can be then used to further support SONI decision making.

The current approach creates a situation where SONI can amply demonstrate that it is busy and engaged but the Panel cannot easily assess whether engagement is:

- Improving delivery
- Reducing risk
- Enhancing value
- Supporting better decisions
- Focusing ambition in the optimal manner across competing priorities

This is particularly material given the scale of system change underway, the consequent cost implications for consumers and, the increasing reliance on stakeholder cooperation/participation.

SONI notes that the Engagement Framework is subject to continuous development and further enhancements are planned for the coming year, potentially using independent expertise and an enhanced system of benchmarking. We understand that the Engagement Framework is constantly evolving in a positive manner and that SONI are taking on board feedback from a range of stakeholders to influence its development further. We look forward to the results of this work.

Deliverables

The infographics on Overall Performance and Deliverables provide a high-level overview of SONI projects across the year and are a welcome addition to the Report.

The Panel have noted over each Performance Report 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 “rebasings”) to timelines/milestones (for some projects) which have been difficult to assimilate without making reference to multiple documents.

The Section does not provide any aggregation of delivery performance. Deliverables are listed individually. This could be enhanced by providing numerical data on: Total number of deliverables; Number completed vs not completed; Percentage delivery rate – rather than requiring the reader to infer delivery performance themselves.

There is limited distinction between an “output” being delivered and the desired outcome being achieved (they are not necessarily the same). There is little information on: Measurable impact; delivered value to the consumer; System benefit.

The reasons for non-delivery are usually the same high level non-SONI factors

- Policy evolution
- SEM coordination
- Third-party dependencies

Stakeholders would also 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

SONI note that the changes to its governance process continue to consume significant resource. We look forward to the completion of this work which will allow SONI (under its new structure) to deliver its responsibilities more effectively and direct its resources primarily towards its core responsibilities.

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.

SONI’s initiatives to address system wide costs are embedded within and distributed across the entire Performance Report and span projects under all four Roles. The Panel has previously noted that it is difficult to find more than qualitative analysis of the impact of these initiatives on system wide costs. We remain of the view that 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.

One such example, noted above, is that of substantial benefit associated with SDP-02 ESPS integration. This was presented at the Stakeholder Day and not as part of the main formal Performance Report. This *quantitative* analysis provides an instantly accessible view of the costs and benefits which SONI is incurring/delivering on behalf of stakeholders. It is worth noting that without SONI's decision to provide this valuable additional information, the scale and scope of the benefits from the project would have been far less visible from examining the Report alone. Where possible and relevant, the use of *numerical* data in the performance report should be expanded to enable SONI to demonstrate its added value and stakeholders to more easily understand the relative benefits across both projects and timescales.

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

We have previously noted 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.

Self-Assessment

SONI have continued the more detailed justification of their self-assessment which was first seen in the recent Forward Work Programme. This is helpful understanding the linkages between the narrative, SONI's self-assessment and each of the four assessment Criteria, covering the four Roles.

Review of the Performance Report

Performance Measures

- **SNSP Penetration:** The variance to target (80%) is clearly explained. SONI have detailed plans to achieve the target and to address recently identified system stability concerns.
- **System Frequency:** System frequency was within the “normal” range. This is despite the complex and challenging system operation background during the year. 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. SONI itself notes “As decarbonisation accelerates, maintaining frequency stability will require new tools and operational approaches to compensate for reduced conventional generation”. 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, the frequency control requirements of the 2030 system will provide additional challenges. It may be worth considering the value of a “Frequency Risk and Control Framework” – or, if this already is in place, using it to provide stakeholders with more information on the disaggregated risks to system frequency.
- **Imperfections Costs:** As noted in the General Comments, SONI have provided a detailed and helpful explanation of their approach to minimising imperfections costs, whilst maintaining a safe and secure system. Performance measures are primarily to highlight areas where innovation can provide enhanced outcomes, or to highlight choices/trade-offs for consideration. It may be that a different approach to imperfections costs could yield additional value for stakeholders, rather than one over which SONI has very limited control. We suggest that consideration be given to the development of a more tractable and user-friendly measure of “system operation efficiency” such that the individual cost components of system operational policies, investment decisions and strategic ambitions can be clearly defined and allocated. This is not simply to “minimise costs” but to allow stakeholders to understand (*and debate*) the various complex trade-offs and resultant costs of the policy decisions taken on the operational envelope as the system changes and develops.
- **Stakeholder Satisfaction:** SONI notes that overall satisfaction improved to 100%, with a notable 15-point increase in the “Very Satisfied” category. Whilst this does indeed demonstrate strong progress in stakeholder engagement the Panel have difficulty in interpreting the data as 100% overall satisfaction. SONI have noted for each individual activity the effort put into and the level of stakeholder engagement achieved and this individual data provides a more comprehensive picture of the progress which is being made. We note that SONI has plans to further develop its stakeholder satisfaction metric and look forward to the results.

- Timely Delivery of Publications: Four of six scheduled milestones were delivered, including key FASS-related updates. Two were delayed due to external dependencies outside of SONI's control. It is worth noting that where important information could be presented outside of the formal reporting process, SONI took the initiative to provide it to stakeholders.

Role 1 - System Operations & Adequacy

SONI effectively communicates:

- The increasing difficulty of system operation
- The interaction between renewables, system services, and constraints
- The operational risks being managed in real time.

This underpins SONI's justified view that Role 1 performance is both critical and increasingly demanding.

This section of the Report demonstrates competent execution of core TSO duties, including the various complex activities SONI undertake on a daily basis, together with working various stakeholder relationships developed and utilised to underpin the Role.

However, whilst metrics are reported, they are rarely presented against:

- Explicit targets
- Acceptable tolerances
- Year-on-year improvement expectations

As a result, the Panel are presented with information on what has happened, but without the contextual background to determine:

- Whether performance was "(just) good enough, acceptable or optimal."
- Whether it is improving year by year
- Whether risks are reducing/increasing

Operational performance improvements (e.g. SNSP) are not clearly linked to:

- Specific Role 1 projects
- Specific investments
- Specific operational changes

This in turn makes it difficult to assess:

- Which initiatives delivered value
- Whether costs were justified
- What delivered the greatest incremental benefit

Continuing a theme seen throughout the Report, projects are assessed primarily as: Completion; Progress; and Readiness - rather than:

- Impact on reliability
- Cost efficiency
- Consumer outcomes

Performance reporting remains largely descriptive, with limited use of targets, attribution, or impact measurement. Operational incidents are acknowledged, but the frequency, severity, and consumer impact are not consistently quantified. Links between incidents and corrective actions are also limited. This does not promote confidence that learning from incidents is being systematically used to reduce future risk. Similarly, the costs of, and returns from, capability investment are difficult to assess.

Since system security is a core TSO responsibility, there will be a suite of metrics and processes under “Business as Usual” activities which address these concerns. Since these do not fall under the remit of the EPF, the challenge for SONI is to provide a reporting mechanism for those activities which DO, under the system operation Role, which also meets the Panel’s needs regarding Performance reporting. These include hard metrics, targets, attribution and impact measurements which will allow the Panel to more fully assess performance, value, and improvement.

As examples, from the information available at present, it is difficult to determine how SONI measures whether investments in operational capability have materially improved system performance or reduced operational risk, and; how SONI assesses whether operational improvements provide net benefits to consumers.

Criterion 1 – Delivery

For FASS, SONI delivered key milestones with minor variances due to SEMC decision delays and initial resource challenges.

The Scheduling and Dispatch Project (SDP) is also a fundamental pillar of the new operational landscape. The SDP project has been subject to “vendor related” delays and a “full re-baseline”. SONI consider that it maintains its overall trajectory with the SDP remaining on track against its “revised delivery plan”. It would be helpful to understand whether this revision adds significantly to project timescales and the impact of delayed benefits on stakeholders.

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 80% SNSP Operational Trial has been re-baselined for sound technical and operational reasons. We note the decision made by the OPRC not to proceed with

the trial at this time, due to unresolved operational stability concerns. This is a prudent outcome and SONI have the necessary studies in place to provide confidence that the technical aspects of a future trial will have been thoroughly researched. However, there is no high-level indication of when an operational trial might be reconsidered.

The Control Centre tools project has been impacted by revisions to timetables stemming from “delays outside of SONI’s control”. Again, it would be useful to have a quantitative assessment of the delay in stakeholder benefits from the timetable extensions, particularly as the project is categorised as “Very High” cost impact.

SONI note that “All milestones experienced delays due to limited availability of key personnel engaged in higher-priority projects and operational tasks.” Dynamic rescheduling of resources is a necessary part of responding to evolving challenges. However, it would be helpful to know if this limited availability of key personnel was primarily due to the exceptional circumstances faced by SONI over the period or an ongoing resource limitation, which needs to be addressed.

Additional Project 1 - Operational Resilience and Two-Set System Operation

The Panel notes that SONI faced one of the most operationally challenging periods in its history during 2024/25. SONI’s response and the outcomes achieved deserve a particular recognition. Delivery is self-evident as the system was maintained within operational limits, adaptability was shown particularly given the restricted options available and the need for innovative solutions, in rapid timescales. Stakeholder satisfaction is evident not only from the outcomes achieved but also from the ways in which SONI constructively engaged throughout the period to ensure full engagement and integration. SONI have also demonstrated sustained adaptability and agility in meeting the challenges presented to them throughout the year. As the Panel have noted elsewhere, the EPF is not necessarily designed to evaluate “core” TSO responsibilities. However, given the extraordinary circumstances, SONI should be highly commended on their approach, operation and delivery of “Additional Project 1”

Additional Project 2 – Energy Management System

SONI notes that whilst dealing with the significant challenges above, it successfully completed the Energy Management System Upgrade, which delivers major enhancements in system performance, resilience, cybersecurity and operational reliability.

This is a welcome development and SONI deserve recognition for successfully upgrading a key operational system during a period of challenges to the overall system. However, from the information in the Performance Report it is unclear what the original timetable for this project was and whether it was originally delayed from a previous period or accelerated to provide needed additional system operation capability during a challenging period.

Overall, the Panel consider that the delivery of Projects defined under Role 1 in the EYPR can be seen as MEETING expectations for the Delivery criterion.

Criterion 2 – Stakeholder Satisfaction

FASS has maintained strong engagement with both through the design and consultation phases, with monthly Future Power Market workshops and “day in the life” worked examples being notable initiatives.

Similarly, the SDP project demonstrates an extensive engagement and communication programme, including bilateral meetings with key participants in addition to the plenary Future Power Market workshops. SONI also notes the actions taken in response to stakeholder feedback and the positive impact that this has had,

SONI continue to liaise well with stakeholders regarding the 80% SNSP operational trial and the implementation of the revised SNSP calculation.

The Panel consider that SONI’s planned activities defined under Role 1 in the EYPR can be seen as MEETING expectations for the Stakeholder Satisfaction criterion.

Criterion 3 – Adaptability

FASS has a number of regulatory dependencies which have had an impact on the timetable. SONI has responded by establishing a document-sharing and alignment process to help mitigate the impact of these delays by allowing workstreams to progress alongside the regulatory approval process.

The SDP project has made progress this year, despite significant challenges. These in turn have required SONI to demonstrate its adaptability and in so doing mitigate any impact on the project’s overall critical path.

For the 80% SNSP trial, SONI has responded and adapted to emerging new risks and information on several fronts. The revised SNSP calculation provides an enhanced platform for the trial, when system conditions allow.

The Control Centre Tools project has demonstrated the need for adaptability as SONI address the novel aspects of its requirements, along with dynamic updates to process and sequencing.

The Panel consider that SONI's activities and approach defined under Role 1 in the EYPR can be seen as EXCEEDING expectations for the Adaptability 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. All the projects are in full alignment with this outcome.

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. SDP is enhancing real-time system operation, whilst FASS embeds security of supply into future system service design. The ambition of the 80% SNSP trail is fully aligned. Actual operation is likely to require further innovation.

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. We have noted elsewhere that more could be done to provide stakeholders with tangible measures regarding system costs, the scale of the cost/benefits achieved by SONI in their projects and the overall future trajectory of system costs. It is acknowledged that there are several variables in this analysis, but it would be of significant value to a range of stakeholders.

SONI Service Quality – In projects 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. SDP in particular has provided a benchmark experience, including structured monthly workshops, newsletters, bilateral readiness sessions and detailed guidance materials.

Role 2 – Independent Expert

The section provides clear evidence of:

- Extensive analytical work
- Trusted technical advice provided across a wide range of system, policy, and market topics
- Effective engagement with complex and emerging issues

This supports confidence that SONI has both the capability and credibility to act as an independent expert.

SONI demonstrates a wide spectrum of engagement in the Role with; regulators, government, industry, and stakeholders. Valued contributions to consultations, studies, and evidence-based discussions

This reinforces SONI's position as an active and informed system authority.

SONI's advice and guidance is presented and received as balanced and evidence based, which strengthens trust in the independence of the role.

However, there is an implicit assumption that the provision of advice is treated as the outcome. From the Report, there is insufficient information to fully determine the extent to which the advice influenced decisions, was accepted, rejected or modified and; how that advice was directly linked to improved system or consumer outcomes.

It would also be useful to access structure stakeholder feedback on the value of any advice received, rather than high level assurances.

If SONI is to maintain and expand its role as a trusted independent expert it will need to be able to demonstrate:

- How it tests the quality of its advice and seeks continuous improvement
- Whether past/previous advice has been validated or refined
- How its internal and external change processes operate and the learning resulting from them

Role 2 needs to strongly demonstrate SONI's effectiveness as an independent expert advisor to regulators, policymakers, and stakeholders. The Report evidences SONI's strong technical competence and breadth of advisory activity, but it remains largely qualitative, with limited evidence that advice provided was timely, influential, or demonstrably improved decision-making outcomes.

From a regulatory assurance perspective, credibility is high, but the evidence base needs to be strengthened to demonstrate the impact of the work done.

Criterion 1 - Delivery

SONI delivered a number of key milestones across Role 2 projects, including the rollout of the Public Engagement Model and Landowner Charter, the Price Control engagement programme, the Future Energy Modelling Report, Dispatch Down Action Plan, and the TSO-DSO Operating Model.

The Dispatch Down Action Plan provides a firm foundation reducing the amount of “dispatch down” over the long term. In addition to project deliverables, SONI also took forward associated workstreams, including the dynamic line rating project and engagement with thermal generators regarding minimum stable generation.

The SONI Public Engagement Model and Landowner Charter represents a more collaborative and coherent framework for these activities with SONI noting that one key benefit has been “the strengthened relationship with stakeholders across its design, development and delivery stages, embedding early engagement as a core principle in its wider engagement strategy”

SONI’s work in supporting the Northern Ireland Energy Strategy continues to grow and deepen, with controllable milestones met. SONI remains ready to support the DfE once the delayed Smart Systems and Flexibility Plan becomes available.

Overall, the Panel consider that the suite of Projects defined under Role 2 in the EYPR can be seen as MEETING expectations for the Delivery criterion.

Criterion 2 – Stakeholder Satisfaction

It is evident throughout the Performance Report 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.

Stakeholder engagement throughout the development of the Dispatch Down Action Plan appears to have been extensive and positively received across a wide range of stakeholders, with acknowledgements and collaboration not only within Northern Ireland but across GB. Stakeholders benefited from an improved understanding of SONI’s role and responsibilities together with an appreciation of the level of commitment exhibited.

The FEMG has been well received and considered a valuable tool for informing cross government decision making. SONI has demonstrated structured, cross-organisational modelling collaboration, particularly between SONI, DfE and the UR. The success of this initiative will result in a broader participation of stakeholders in the future and a potential widening of the remit of this workstream.

The Public Engagement Model and Landowner Charter represent a more stakeholder focussed approach to these activities, with extensive engagement across the stakeholder community, the use of tailored approaches and issue specific initiatives.

Supporting the NI Energy Strategy is a key role which continues to develop. Collaboration and effective stakeholder engagement are critical to its success. SONI's involvement in a range of key initiatives is adding value to the process with positive feedback from stakeholders.

SONI's collaborative approach to the TSO-DSO Future Operating Model project with NIE Networks has resulted in issues being identified and addressed at an earlier stage of development, thus allowing effective remediation actions to be taken.

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, which highlight SONI's "early engagement" approach to developing the SRP27 Business Plan.

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

Criterion 3 - Adaptability

There is sufficient evidence that SONI has demonstrated agility and adaptability in a number of ways in fulfilling its obligations under Role 2, including re-prioritisation where necessary, acceleration of key projects to meet emerging needs, flexing its engagement activities to suit the needs of stakeholders on a dynamic basis and seeking innovation outside of established resource pools to deliver technical solutions. There is also evidence of using flexible governance structures to match the demands of evolving workflows.

SONI have demonstrated flexibility in adapting to evolving government priorities and requirements which were not defined at the time the Forward Work Programme was finalised.

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

Role 2 - Contribution to Outcomes

Decarbonisation – The Performance Report Plan demonstrates 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 activities over the year.

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 Report.

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. Whilst all the activities will contribute to optimising system wide costs, it would be helpful to understand how SONI evaluates the optimal mix of initiatives, on a multi-year timeframe, given the pressure on finite resources.

There is evidence within the 2025/26 Forward Plan that SONI recognises the need to set out how it arrives at the “optimal” suite of development activities, given strategic objectives and associated timeframes, together with necessarily limited resources.

SONI Service Quality – In its deliverables 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 (taken on board and acted upon) is also evident.

Role 3 System Planning

SONI’s activities under Role 3 evidence a wide range of:

- System design options
- Scenario analyses
- Network development studies
- Policy-aligned planning exercises

This demonstrates a well-resourced and technically capable planning function.

The activities are clearly aligned with government policy and decarbonisation objectives incorporating the strands of Net zero trajectories, increased renewables integration and future demand uncertainty.

SONI seeks to deal with unavoidable uncertainty through recognition of the effects of policy evolution, availability of data and external factors. This avoids the potential worst mistakes of a deterministic approach.

However, studies, consultations, and reports are implicitly framed as success, with limited assessment of:

- Forecast accuracy
- Scenario robustness
- Policy decision/choices and associated influences

As a result, the Panel cannot easily assess whether planning is improving or delivering better decisions.

From the Report, it is difficult to determine how and if SONI perform:

- Retrospective validation of assumptions from previous plans and how future assumptions might be improved
- Performance tracking against forecast(s)
- Measurement of uncertainty reduction

Delays and re-sequencing are explained but not quantified, compared to original timelines or used to demonstrate improved planning assumptions/contingencies in future plans. It is difficult to discern supportive evidence that planning outputs:

- Directly informed decisions
- Accelerated delivery
- Reduced cost, risk, or delay
- Were meaningfully influenced by analysis

Role 3 covers SONI's system planning responsibilities, including long-term scenarios and network development considerations. The section demonstrates significant analytical effort and policy alignment, but again, outputs are treated as delivery, with limited retrospective evaluation of planning quality, accuracy, or downstream/delivery influence – and incorporation of the resultant learning for better outcomes.

The Panel suggests that SONI consider how it could provide additional evidence in the following areas:

- The mechanisms by which uncertainty and policy change are reflected in planning confidence and delivery expectations, rather than retrospectively explaining any resulting variance.
- Details of SONI's assessment process to assure stakeholders that the system planning activity is improving in quality, robustness and usefulness to decision-makers
- Quantifiable evidence that the system planning activity has reduced delivery risk, avoided cost, or improved value-for-money for consumers.

Criterion 1 - Deliverability

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 MEETING expectations for the Deliverability criterion.

Criterion 2 – Stakeholder Satisfaction

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 – Adaptability

We 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 which is a step up compared to the previous Performance Report.

SONI's planned activities and approach defined under Role 3 can be seen as MEETING expectations for the Adaptability 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

The Section provides a clear description of SONI's role and responsibilities under the Commercial Interface duty. SONI provide tangible evidence of its ongoing engagement with relevant parties and the development of structures to support the role.

However, there are some areas which could benefit from review. Commercial effectiveness is inferred from processes being followed and interfaces being maintained, rather than:

- Cost efficiency
- Effective dispute reduction and resolution
- Timeliness of commercial resolution

In tandem, there is a lack of tangible performance metrics across areas such as:

- Cost savings achieved either for SONI or stakeholders
- Efficiency improvements
- Transactional performance (timeliness, errors, disputes)
- Reductions in system cost and/or risk

As such this makes it difficult to discern the true value adding/value for money benefits under Role 4.

Role 4 deals with SONI's commercial and contractual interfaces, including interactions with market participants, commercial stakeholders and NIE Networks. The section shows that necessary processes and engagements are in place to discharge the Role effectively. However, success is framed primarily in terms of process execution, with scarce evidence of efficiency, value-for-money, or commercial performance improvement.

Criterion 1 - Deliverability

SONI notes that this role covers its activities as the commercial interface for the transmission system. It includes managing customer interactions through the Connection Offer Process, working with NIE Networks on associated construction offers, and preparing Connection Agreements and Transmission Use of System (TUOS) agreements.

For this Performance Report, the focus is primarily on delivery of elements of the LCIS initiative. The progress made in enhancing joint ways of working with NIE Networks is mentioned elsewhere in the Report.

However, there is no mention of the "customer journey" for those wishing to connect to the transmission system, even though one of the key activities under this role is "giving developers and customers early visibility of connection options and system capacity." We have previously noted that 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" system development, the adoption of the transmission "Cluster Policy" and the initiative to determine actual (rather than nominal) Nodal transmission capacity) it might be expected that the Performance Report would reference how these are being incorporated into the Commercial Interface. Early and informative engagement with potential connectees can bring not only benefits for them but also the opportunity for SONI to suggest mutually beneficial actions/options which can lead to better outcomes for all stakeholders.

SONI were asked at the Stakeholder meeting to provide further information on this issue and provided a valuable and informative response which promoted confidence that these issues are being proactively addressed. It is for consideration how this work might be properly incorporated in the next Performance Report.

There is evidence that in projects such as LCIS, a flexible and inclusive approach by SONI is assisting ambitions in moving forwards.

SONI have delivered the core milestone under this activity, the public consultation on LCIS Phase 2. This, together with delivery of the Recommendations Paper, means that SONI have facilitated the next stage of the overall programme, which is subject to external dependencies.

Overall SONI's activities under Role 4 may be seen as MEETING the Deliverability criterion.

Criterion 2 – Stakeholder Satisfaction

The Report provides sufficient evidence of SONI's commitment to Stakeholder satisfaction. Structured engagement, consultations and customer feedback support the view that SONI provides thorough and quality interaction, supported by robust technical capability, on an ongoing basis. The integration of LCIS updates into wider operational Fora also highlights SONI's commitment to engagement. Positive stakeholder feedback was received.

SONI's activities under Role 4 may be seen as MEETING the Stakeholder Satisfaction criterion.

Criterion 3 – Adaptability

LCIS is a critical project under Role 4. Complex projects inherently demand a high level of adaptability in their management and delivery.

SONI note that they have “actively adjusted programme timelines and internal sequencing to account for the complexity of system studies, the need for comprehensive legal review and the importance of ensuring procurement arrangements are robust before seeking SEMC approval.”

This flexibility not only ensured that the project proceeded on a robust base but also allowed the opportunity for additional value adding elements including enhanced stakeholder engagement.

SONI's activities under Role 4 may be seen as MEETING the Adaptability criterion.

Role 4 – Contribution to Outcomes

Decarbonisation – The commercial interface role is critical to delivering the new and enhanced services/market arrangements which the system will need to deliver the energy transition. SONI's activities under Role 4 are fully aligned with this.

The LCIS programme contributes directly to strategic goals by facilitating the inertia, reactive power and short-circuit strength targets required to operate the system securely with significantly higher levels of renewable assets.

Grid Security – As the volume of conventional plant on the system either reduces or retires, the maintenance of grid security requires new approaches. The LCIS project provides the foundation for the required services to support a system with a greater nonsynchronous penetration. Extensive technical studies combined with a robust evidence base provide reassurance that SONI is addressing the challenge.

System Wide Costs – The activities under the LCIS initiative incorporate the need to enable a future low carbon system whilst recognising the importance of optimising system costs both in the transitional and final operating regimes. This incorporates robust technical analysis, regulatory alignment and a delivery programme incorporating a competitive element to deliver the required services.

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 Performance Report

The Panel followed the UR Guidance, which involved determining a graded score for how each criterion was met in each of the four SONI roles, and ultimately an overall assessment grade for the Report.

Each Panel member separately undertook the assessment in advance of the Stakeholder meeting on 24 February 2026. Following that meeting, the Panel reviewed the evidence submitted by SONI in its Report and in answer to questions submitted by the Panel together with presentations at the Stakeholder meeting. The Panel also took into account the three written stakeholder submissions, verbal feedback at the meeting and further additional information provided by SONI, post the Stakeholder meeting.

The Panel then agreed a consensus score for each criterion and agreed grades for each role and an overall assessment grade for the Performance Report.

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

TABLE 1		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	Delivery	0	0	0	0
2	Stakeholder Satisfaction	0	1	0	0
3	Adaptability	1	1	0	0
Assessment Total		1	2	0	0
Assessment Grade		4	4	3	3
Overall Grade		3.53			

[The scores for each criterion run from -1 to +1, and the grades run from 1 (poor) to 5 (excellent). Grade 3 is "baseline".]

Table 1 shows the detail of the scores and grades, with an overall Grade of 3.53.

SONI's Performance is therefore deemed (using the language in the UR guidance to the Panel) to be:

- Good for Role 1, System Operation and Adequacy,
- Good for Role 2, Independent Expert,
- Baseline for Role 3, System Planning, and
- Baseline for Role 4, Commercial Interface.

The Panel notes that this is an improvement on the assessed grade for the previous Performance Report.

The Panel recognises the significant efforts made by SONI in the production of this Performance Report under the EPF guidance. The Performance Report 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 and integration of a clear and robust SONI Strategy to support its range of responsibilities.

Recommendations

1. In order to allow SONI and the Panel to more effectively support the aims of the Framework, future reporting must move decisively from simply describing activity to demonstrating numerical outcomes, quantifiable impacts and measurable learning.
2. The Section on Overall Performance is a welcome addition. The section describes performance through narrative and explanation rather than demonstration of quantifiable impact and delivery of value to consumers. Moving forward, SONI should consider integrating quantitative metrics into this section to demonstrate benefits and value to consumers.
3. Milestones are important steps within delivery. However, they do not represent outcomes or tangible benefits. We suggest that the Foreword provides an ideal opportunity to present quantifiable impacts/benefits/savings (even at a high level) for stakeholders. This translation of activity into quantifiable benefit would be a major addition to the Performance Report.
4. Given the targeted and pressing time-bound ambitions of the decarbonisation initiative it would be useful to understand the way in which the suite of projects which are undertaken are holistically managed and reviewed on a cross enterprise, multi-year basis, particularly against the suite of “hard targets” contained in the above.
5. For future Performance reports, it would be valuable to map the progress made each year not only against period specific goals but also those of the overall strategy (rather than simply the four strategic “pillars”). This would allow stakeholders to have a high-level appreciation of the progress being made, what the strategic challenges were and their potential impact,

Tom Doran

Dr Scott King

Robert Longden

13 March 2026