

2025- 2034 SONI's Transmission Development Plan for Northern Ireland 2025-34

**Decision Paper
27th July 2026**

About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Millenium House in the heart of Belfast. The Chief Executive and two Executive Directors lead teams in each of the main functional areas in the organisation: CEO Office; Price Controls; Networks and Energy Futures; and Markets and Consumer Protection and Enforcement. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

OUR MISSION

To protect the short and long-term interests of consumers of electricity, gas and water.

OUR VISION

To ensure value and sustainability in energy and water.

OUR VALUES

ACCOUNTABLE:

We take ownership of our actions.

TRANSPARENT:

Ensuring trust through openness and honesty.

COLLABORATIVE:

Connecting and working with others for a shared purpose.

DILIGENT:

Working with care and rigour.

RESPECTFUL:

Treating everyone with dignity and fairness.

ABSTRACT

SONI is the Transmission System Operator (TSO) for Northern Ireland and is responsible for ensuring continuity of electricity supply for homes and businesses across Northern Ireland. In order to do so SONI must plan investment in the transmission network.

The Transmission Development Plan for Northern Ireland (TDPNI) is the proposal for the development of the NI transmission network and interconnection over the ten years. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

AUDIENCE

This document is likely to be of interest to regulated companies in the energy industry, government, industry groups, consumer bodies, environmental groups and those with an interest in the energy industry and network planning.

CONSUMER IMPACT

The TDPNI provides clarity to consumers on:

- 1) The drivers of electricity transmission investment;
- 2) The need for action in delivery of key infrastructure projects;
- 3) The location and activity of network investment; and
- 4) The estimated cost and timing of project completion.

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Executive Summary

The Transmission Development Plan for Northern Ireland (TDPNI) 2025-2034 is the proposal for the development of the Northern Ireland transmission network over the ten years from 2025. This plan presents projects that are expected to be needed for the operation of the transmission network in the short and medium-term.

The TDPNI will support the delivery of relevant wider energy policy objectives, including those reflected in national and EU policy frameworks. These objectives include:

- a) Ensuring the security of electricity supply;
- b) Ensuring the transmission system is an economical system; and
- c) Ensuring the long-term sustainability of electricity supply.

In accordance with its' current Transmission System Operator licence (Condition 40), SONI must prepare a TDPNI every year. This requirement is consistent with Article 51 of Directive [2019/944/EC](#). In addition, Article 22(4) of this Directive requires the Utility Regulator (UR¹) to consult on the draft TDPNI prepared by SONI.

As part of this process, SONI has consulted upon a plan and submitted a draft TDPNI to UR for consideration. UR has [consulted](#) on the draft plan, sharing stakeholder views with SONI.

Both UR and SONI have considered the responses. This paper sets out the findings of the consultation and the final decision of UR regarding approval of the 2025-2034 TDPNI.

We are engaging with SONI in regard to the next iteration of the TDPNI and on further consulting on changing the preparation of a TDPNI from an annual activity to a two year activity.

¹ In this document we use the words “us” “our” “we” “Utility Regulator” and “Authority” in each case to refer to the Northern Ireland Authority for Utility Regulation: see Article 3 of the Energy (NI) Order 2003 (the Energy Order)

1. Introduction

Background

- 1.1 SONI, as the Transmission System Operator (TSO) for Northern Ireland, is responsible for planning and operating the transmission system. While SONI plans the development of the network, NIE Networks, as Transmission Owner (TO), is responsible for the delivery, maintenance and asset replacement of transmission infrastructure. Together, both organisations work to ensure the network can support future electricity demand, facilitate economic growth, maintain security of supply and integrate increasing levels of renewable generation.
- 1.2 This TDPNI has been developed against a backdrop of significant energy transition and decarbonisation ambitions. Northern Ireland's Energy Strategy, *The Path to Net Zero Energy*, and the Climate Change Act (Northern Ireland) 2022 establish targets to achieve at least 80% renewable electricity consumption by 2030 and net zero greenhouse gas emissions by 2050. Delivering these objectives requires substantial transformation of the electricity system, including increased renewable generation, electrification of heat and transport, greater system flexibility and significant reinforcement of the transmission network.
- 1.3 To identify future network needs, SONI uses scenario-based planning through its *Tomorrow's Energy Scenarios* (TES) process². This assessed a range of possible future energy pathways and helped identify areas where reinforcement may be required. Planned developments are then assessed against the Transmission System Security and Planning Standards (TSSPS) to ensure the network remains secure and capable of meeting future requirements.
- 1.4 Overall, the TDPNI serves as the strategic blueprint for developing Northern Ireland's transmission network over the next decade. It seeks to balance security of supply, affordability, sustainability and environmental considerations while enabling the delivery of government energy and climate policy objectives and supporting the transition to a low-carbon electricity system.

Related Documents

- 1.5 The UR consulted on the [SONI Draft TDPNI 2025-2034](#). This was accompanied by:
 - a) SONI Report - [TDPNI Consultation Responses](#);

² [Tomorrow's Energy Scenarios \(TES\) | SONI](#)

- b) Strategic Environmental Assessment (SEA) – [Environmental Report](#);

1.6 This paper should be read in conjunction with:

- a) SONI Final TDPNI 2025-34 – [Report](#)
- b) UR Consultation – Stakeholder Responses.

2. SONI's Draft TDPNI

Overview

2.1 The key drivers for network development include:

- a) Security of supply- maintaining reliable electricity delivery
- b) Renewable integration- accommodating large-scale wind, solar and future offshore generation.
- c) Market integration- supporting cross-border electricity trade and interconnection.
- d) Asset replacement- upgrading ageing infrastructure, much of which is over 60 years old.

Main Findings

2.2 SONI's TDPNI 2025-2034 is the sixth such plan that it has had to complete. This ten year plan undertakes a variety of functions including:

- a) The Approach & Strategy for developing the Northern Ireland Electricity Grid;
- b) Detailing Network Investment needs;
- c) Details of planned Network Developments;
- d) Descriptions of the TSO's planning process;
- e) Details of project information i.e. category, planning area, location, activity, estimated cost and completion date.
- f) Integration of SONI's Tomorrows Energy Scenarios
- g) Integration of projects identified within SONI's Shaping Our Electricity Future

2.3 The TDPNI describes 150 different projects under this plan. Of these, 105 are NIE Networks asset replacement projects and 45 are network development projects.

2.4 On a region and project category basis, the network development projects are categorised as follows:

Table 1: Projects by Planning Area and Category

Projects by Planning Area and Category				
Project Category	North-West	South-East	Both Areas	TOTAL
New Build	11	12	0	23
Uprate / Modify	9	10	1	20
Refurbish / Replace	0	0	0	0
Combination / Other	0	2	0	2
TOTAL	20	24	1	45

2.5 SONI's expenditure on transmission development projects due for completion over the period 2025 - 2032 is estimated at £128.1 million. This figure is the amount SONI states is required to bring projects to the point of handover to NIE Networks. Estimated Transmission Owner (TO) costs associated with these projects are estimated at £971.06 million, as stated within SONI's Draft 2025-2034 TDPNI.

2.6 Estimated TO costs associated with the Asset Replacement plan are £214.83 million, as stated within SONI's Draft 2025- 2034 TDPNI.

2.7 The total estimated cost of all projects described in the TDPNI 2025-2034 is £1.31 Billion (£1,313.99 million as stated within SONI's Draft 2025-2034 TDPNI).

2.8 The UR will determine the amount that can eventually be recovered from customer and generator tariffs for these projects. Some of these projects will be part of the RP7 period. A link to the RP7 determination can be found at [RP7 Price Control Final Determination published | Utility Regulator](#).

2.9 To allow for comparison of transmission development projects on a year-on-year basis, data is represented at a fixed point in time, referred to as the data freeze date. The data freeze date of TDPNI 2025-2034 was 13 August 2025.

2.10 The Strategic Environmental Assessment (SEA) is the process of appraisal through which environmental protection and sustainable

development may be considered and factored into national and local decisions regarding Government plans and programmes. The SEA report is used to evaluate the environmental effects of proposed policies before they are adopted. It should be noted that they have a five-year lifespan, therefore SONI's latest SEA was published on 17 May 2024.

2.11 The Habitats Regulations Assessment (HRA) is a mandatory process that evaluates the potential impacts of a proposed plan or project on protected European wildlife sites (SACs, SPAs, and Ramsar sites). It ensures that development proposals do not negatively affect the integrity of these sites. The HRA report is a legal process used to determine whether a plan or project could harm protected wildlife sites. This is also anticipated to be valid for five years, SONI has published the latest HRA in May 2024, which is available on SONI's Website³. SONI states that they have assessed the draft TDPNI 2025-2034 against Strategic Environmental Objectives as established in the SEA Environmental Report.

2.12 SONI has also produced a report summarising the feedback received from its own consultation. It details the TSO responses to issues raised and determines if subsequent changes are required to the initial version of the TDPNI to the updated plan consulted upon by UR. This report is available on SONI's website [here](#).⁴

Supporting Initiatives

Joint Programme Management Office

- 2.13 To allow a more transparent view on grid delivery timelines, SONI and NIE Networks established a Joint Programme Management Office (JPMO) in 2024. This provides a comprehensive review of all major transmission reinforcement projects. Since then, two quarterly updates have been published by NIE Networks and SONI to address ongoing changes to timelines⁵.
- 2.14 The JPMO process is used to jointly agree estimated completion dates. These dates have been incorporated into the TDPNI report and will continue to guide future updates on the delivery of Northern Ireland's transmission network projects.
- 2.15 The estimated completion dates are explained using four project categories, detailed as; conceptual projects, projects in (system) planning, projects in pre-construction and projects in delivery.
- 2.16 SONI and NIE Networks have committed to continue to provide a quarterly update on transmission infrastructure projects.

³ <http://www.soni.ltd.uk/the-grid/projects/tdpni/related-documents>

⁴ <https://cms.soni.ltd.uk/sites/default/files/2026-07/TDPNI%202025-2034.pdf>

⁵ <https://www.nienetworks.co.uk/investment/work-in-your-area/transmission-projects>

DfE's Grid Delivery Monitoring Group

- 2.17 The Department for the Economy also established a Grid Delivery Monitoring Group in response to challenges associated with the timely delivery of electricity transmission infrastructure. The group aims to support the achievement of statutory decarbonisation targets and a just transition, as set out in the Climate Change Act (Northern Ireland) 2022, through a focus on accelerating grid delivery and addressing barriers to implementation. It provides a coordinated forum for oversight of key transmission projects and associated delivery timelines.
- 2.18 The Grid Delivery Monitoring Group brings together representatives from DfE, UR, SONI and NIE Networks to review progress on critical grid infrastructure, identify emerging delivery risks, and support the implementation of measures to address delays.
- 2.19 This process is intended to strengthen delivery assurance through enhanced coordination and oversight, supporting a more strategic and whole-system approach to network development in line with Northern Ireland's energy policy objectives.
- 2.20 The Minister for the Economy has highlighted the role of the Grid Delivery Monitoring Group in supporting the delivery of critical electricity infrastructure and to address dispatch down constraints and support delivery of SONI's Dispatch Down Action Plan. The Minister has also noted that the Grid Delivery Monitoring Group was established to strengthen oversight and coordination of key network developments required to support power system decarbonisation and the timely delivery of transmission infrastructure⁶

SONI's Dispatch Down Action Plan

- 2.21 In response to increasing levels of dispatch down and associated system constraints, SONI has developed a Dispatch Down Action Plan, which was first published in 2024⁷. This plan aims to identify the key drivers of dispatch down and set out potential measures to mitigate its impact on generators and consumers.
- 2.22 The Action Plan includes a programme of stakeholder engagement, analysis of system and market factors contributing to dispatch down, and identification of both operational and longer-term network solutions. SONI has engaged with industry through workshops and ongoing consultations as part of this process.
- 2.23 While some drivers of dispatch down are expected to persist until the

⁶ [AIMS Portal](#)

⁷ [Draft Dispatch Down Action Plan - System Operator for Northern Ireland - December 2024.pdf](#)

delivery of key transmission reinforcements, including the North–South Interconnector, the Action Plan represents a coordinated approach to managing constraints and improving system efficiency in the interim.

Transmission cluster policy

- 2.24 As part of SONI's draft TDPNI, SONI has also included information on its Transmission Cluster Policy⁸, which is intended to minimise the need for new transmission network reinforcement by maximising the use of existing network capacity.
- 2.25 Under this policy, the initial costs are to be funded by the Northern Ireland consumer, with developers reimbursing these costs once they connect to the cluster substation.
- 2.26 SONI has indicated that the Transmission Cluster Policy supports a more plan-led approach to network development by facilitating the strategic location of generation in areas where network capacity can be more efficiently delivered. This approach is aligned with SONI's *'Shaping Our Electricity Future roadmap'*⁹, which identifies coordinated, forward planning of both network infrastructure and generation as a key enabler of achieving decarbonisation targets.
- 2.27 Following the conclusion of the consultation process, SONI will incorporate the Transmission Cluster Policy into the TCCMS and put this for Decision to UR.
- 2.28 The proposed policy has identified a need for transmission cluster substations at several areas on the transmission network.

⁸ <https://consult.soni.ltd.uk/consultation/transmission-cluster-policy-0>

⁹ [Shaping Our Electricity Future | Future Energy | SONI](#)

3. Findings

Consultation Responses

3.1 Two responses to UR's consultation were received. The two submissions were provided by

- ABO Energy
- Renewable NI

3.2 The responses received primarily focus on challenges associated with the delivery of transmission infrastructure in Northern Ireland, particularly delays, reduced assurance of delivery, and the impact this has on integrating increased levels of renewable generation. Significant emphasis is placed on the need for improved transparency, governance, and accountability within grid development processes, alongside clearer timelines and greater confidence in delivery.

3.3 Respondents also highlight risks to meeting statutory climate and renewable energy targets, including those set under the Climate Change Act and the Department's Energy Strategy. In addition, the importance of key enabling projects such as the North-South Interconnector is reiterated in the context of reducing system constraints and maintaining security of supply, alongside a broader call for a more coordinated, whole-system approach.

3.4 The UR has engaged with SONI regarding the responses received to our consultation. In our engagement, they have provided their response in relation to responses received from the UR consultation on SONI's TDPNI 2025-2034. These are published within Annex 1.

4. Conclusions

Decision

- 4.1 The UR welcomes the responses and engagement from stakeholders on SONI's draft TDPNI. We acknowledge from the responses provided within SONI's consultation and UR's consultation that the focus on increasing renewables on the system, alongside the importance of grid development projects and the North / South Interconnector, remains key to delivering net zero and 80% RES-E targets for Northern Ireland.
- 4.2 In addition, the achievement of these targets will require the continued development of enabling technologies and operational measures to allow the power system to operate securely at high levels of renewable generation, including those set out in SONI's Operational Policy Roadmap and associated initiatives such as Low Carbon Inertia Services (LCIS), Long Duration Electricity Storage (LDES), and System Services frameworks (e.g. FASS).
- 4.3 While UR acknowledges that levels of curtailment and system constraints remain at high levels and that respondents have emphasised the importance of timely delivery of network development, we recognise that projects in SONI's Dispatch Down Action Plan have made an impact on constraint levels.
- 4.4 Delays to key transmission projects risk prolonging these issues, limiting the integration of renewable generation and increasing associated costs to consumers. As such we also welcome the quarterly update on transmission infrastructure projects from the JPMO and note the stability of project dates in the last two quarters.
- 4.5 The Q1 2026 JPMO update¹⁰ reported the project portfolio against the estimated completion dates included in the draft TDPNI and categorised projects by status, including "On Track", "Under Review" and "Revised". The Q2 2026 JPMO update¹¹ shows that the majority of projects remain on track, while a small number have moved to "Under Review" or "Revised", including Energising Belfast, where the estimated completion date has moved from 2032 to 2033.

¹⁰ [JPMO-Network-Delivery-Portfolio-Q1-2026.pdf](#)

¹¹ [JPMO-Network-Delivery-Portfolio-Q2-2026.pdf](#)

DISTRIBUTION BY STATUS

■ On Track ■ Under Review ■ Conceptual TBC ■ Revised

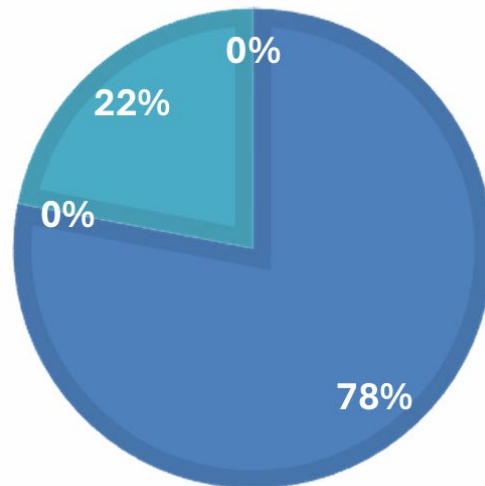


Figure 1 - Extract from JPMO update Q1 2026

Distribution by Status

■ On Track ■ Revised ■ Under Review

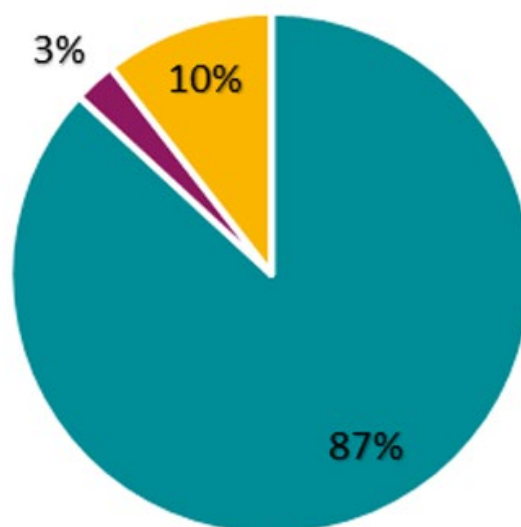


Figure 2 - Extract from JPMO update Q2 2026

- 4.6 While planned network developments are intended to provide additional capacity during current and future TDPNI cycles, concerns have been raised regarding delivery timelines and the ability of the network to evolve at the pace required by the projected additions of renewable generation.
- 4.7 The UR recognises that with the delivery of the Department of the Economy's Energy Strategy, there are important action plans and legislative reforms, to be delivered and implemented in our journey toward 2030. UR is committed to working with all corners of the energy sector to enable and collaborate for the delivery and implementation of the Department's Energy Strategy.
- 4.8 SONI in consultation with Republic of Ireland Transmission System Operator and Northern Ireland Distribution Network Operator and Transmission Owner has set out the required network investment and related TO asset replacement requirements for 2025-2034. It is critical that both SONI and NIE Networks engage and work collaboratively under the framework of the Transmission Interface Arrangements to deliver these projects.
- 4.9 UR welcomes the community engagement that both SONI and NIE Networks have undertaken, relating to projects set out within the TDPNI. We encourage SONI and NIE Networks to continually place community engagement at the forefront of Northern Ireland's network infrastructure development.
- 4.10 It is the decision of UR that the 2025-2034 TDPNI provided by SONI in accordance with Condition 40 of SONI's TSO licence, be approved and published accordingly.
- 4.11 The UR will also issue a future consultation regarding the modification of Condition 40 of SONI's licence. This will enable the preparation of a TDPNI on at least a two-year cycle, supported by an annual revision requirement where projects have materially changed.

**Annex 1 - Summary of responses to UR's consultation on SONI's draft
Transmission Development Plan 2023-2032.**

1. The TDPNI should meet the following standards (as set out in condition 40 of the SONI licence):
 - a) indicate to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years;
 - b) contain all the investments already approved by the Authority and identify new investments which have to be executed in the next three years;
 - c) provide for a time frame and estimate of costs (where reasonable) for all investment projects; and
 - d) contain such other matters as shall be specified in directions issued by the Authority from time to time for the purposes of the Condition.
 - e) contain a reasonable number of future scenarios, which reflect uncertainties and shall, as far as practicable, be consistent with scenarios that licensee uses in other relevant areas of work.
2. Two responses to the UR consultation were received.
3. It should be noted that not all the commentary in regard to the consultation was in relation to the specific TDPNI that SONI and the UR consulted upon, where relevant we have responded in regard to the TDPNI commentary, and we have issued some high-level responses to the other elements, but the bulk of the UR commentary is with respect to the TDPNI consultation.

Issue	Consultation Response	UR Response	SONI's Response
<u>Delivery Delays, Slippage & Loss of Delivery Assurance</u>	[ABO] ABO Energy highlights continued and systemic delays to major transmission projects across multiple TDPNI cycles. It is noted that to progress large scale renewable energy and storage projects across NI, the TDPNI is heavily relied upon. Examples of delays to network development cited include: North-South Interconnector ~2023 to 2031 (delay of 8 years) Armagh Upgrade- 2026 to 2036 (delay of 10 years) Connect West (Mid Tyrone)~ Post 2026 to 2037 (delay of +11 years) ABO stresses that <i>“This is a critical issue from a developer perspective these delays have direct negative impacts on project viability, planning and consents, land agreements and ability to meet delivery targets.”</i>	The UR recognises concerns regarding delays to major transmission projects and the importance of timely delivery of the TDPNI in supporting large-scale renewable and storage development. The UR also acknowledges that the delivery of new transmission infrastructure is inherently complex and involves a wide range of stakeholders. In this context, delivery timelines can be influenced by factors outside the direct control of any single party. We note the explanation provided within the draft TDPNI regarding changes to delivery timelines and welcome the collaborative efforts being progressed by SONI and NIE Networks, including through initiatives such as the Grid Delivery Monitoring Group, to enhance coordination, improve transparency and support the timely delivery of transmission infrastructure.	It is important to note that delivery of new grid infrastructure does not solely lie with SONI or any one organisation in Northern Ireland; multiple parties contribute to the successful delivery of new projects, including NIE Networks, the UR, the Department for the Economy (DfE), the Department for Infrastructure (DfI), local councils and planners. For projects that are cross jurisdictional in nature, like the North South Interconnector, we also rely on EirGrid and ESB Networks. SONI and NIE Networks are committed to continuing to work with these parties through initiatives such as the DfE's Grid Development Monitoring Group to identify ways to accelerate the delivery of new transmission infrastructure. Section 6 of the draft TDPNI transparently sets out the reasons behind the changes to grid delivery timelines.
	[Renewable NI] RNI argues that delivery assurance of	The UR notes concerns that delivery assurance has become a	The TDPNI is the plan for transmission network investment which SONI and NIE

	planned projects is now the central risk, not planning ambition. It was noted that the repeated appearance of the same projects across TDPNI's with dates that are shifting, undermines confidence. RNI highlights the risk of the TDPNI representing an <i>"indicative catalogue"</i> rather than an enforceable delivery plan.	central risk, with repeated delays to key network development projects 'undermining confidence in the TDPNI'. SONI attributes these changes to a range of factors identified through the Joint Programme Management Office (JPMO) review, including the unprecedented scale and complexity of the current investment programme, limitations associated with early-stage project development and external challenges. We welcome the establishment of the JPMO and its quarterly updates which are showing a high level of stability of target dates.	Networks are delivering against.
	[Renewable NI] Strong concerns raised about repeated re-baselining and the removal of Estimated Completion Dates (ECDs). This comes following an increased use of 'TBC' being used in estimated project dates. RNI describes this issue as structural and systematic, rather than project specific.	UR acknowledges concerns regarding the removal of Estimated Completion Dates and increased use of 'TBC'. UR expects SONI to provide as much clarity as is reasonably practicable but is aware that in some cases completion dates cannot be estimated due to early-stage project uncertainty.	The term "TBC" is used when a project is at such an early stage of development that a preferred reinforcement option has not been identified. Setting a completion date when the scale of a potential reinforcement is not yet understood could result in unrealistic delivery expectations. This change has been implemented following the JPMO review of previously published ECDs and is explained in Section 6 of the draft TDPNI 2025-2034.

<u>Governance, Accountability & Oversight Deficits</u>	[ABO Energy] ABO initially welcomed the Joint Programme Management Office (JPMO) as a coordination mechanism. However, concerns are expressed that the JPMO is being introduced in the context of delay and “re-baselining” along with a lack of clarity on governance, regulation, and accountability Specific questions raised: • Who regulates or oversees the JPMO? • How are delivery assumptions challenged? • What formal role does the Utility Regulator play? • How disagreements between SONI and NIE Networks are resolved? <i>“There is no mechanism for external parties to review or interrogate assumptions that are resulting in potentially over-conservative timelines and delayed (and recurrent delayed) issuance of connection offers.”</i>	The UR acknowledges stakeholder concerns regarding governance, accountability and the challenge of delivery assumptions in the context of the JPMO. UR notes that the JPMO has been established by SONI and NIE Networks to enhance coordination and strengthen accountability through improved integrated planning and reporting. While delivery structures remain a matter for the system operators, the UR notes the steps being taken to improve coordination and strengthen delivery processes through the JPMO. We welcome the continued emphasis on transparency and effective reporting, in line with licence obligations.	SONI and NIE Networks established a Joint Programme Management Office (JPMO) in response to concerns relating to grid delivery timelines. The focus of JPMO is on integrated planning, deeper collaboration, accountability and more transparent reporting, to provide more robust timelines for individual project delivery and ensure that the development plan, as a whole is, achievable and deliverable. The JPMO is an improved way of working that supports both SONI and NIE Networks in fulfilling our respective licence conditions. JPMO timelines are aligned with SONI’s licence conditions.
	[Renewable NI] Historic ATR reporting is described as inadequate and inconsistent. RNI has warned that the JPMO risks becoming a delay-management tool, not a delivery	The UR acknowledges concerns regarding the role of the JPMO in supporting delivery and the importance of clear, consistent reporting.	SONI and NIE Networks have committed to quarterly publication of updates on our Network Development Portfolio and providing additional information as part of these transparent updates. We have welcomed and

	accelerator. Calls for: quarterly JPMO reporting, stage-based project tracking and formal risk escalation to DfE and the Utility Regulator Notes the Utility Regulator's own assessment confirms capital underspend driven by slippage, not delivery: <i>"The UR's mid-term review of SONI published in December 2025 confirms that capital underspend to date largely reflects project slippage rather than delivery, and that SONI is behind its own expectations for major transmission projects."</i>	It is noted that SONI and NIE Networks have committed to the regular publication of Network Delivery Portfolio updates, including quarterly reporting, and have taken steps to incorporate stakeholder feedback in this approach. UR welcomes these developments as enhancing transparency and visibility of project progress and considers that continued publication of timely and structured updates will support improved stakeholder confidence and oversight.	implemented feedback directly received from RNI in this regard. Two quarterly updates have been published on the SONI website since the publication of the consultation on the draft TDPNI 2025-2034. JPMO - Network Delivery Portfolio Q1 2026 - For Publication (2).pdf JPMO - Network Delivery Portfolio Q2 2026_0.pdf
<u>Transparency, Visibility & Stakeholder Confidence</u>	[ABO Energy] ABO states that there is no mechanism for external scrutiny of assumptions behind revised delivery dates. Insufficient transparency hampers: project pipeline planning alignment with network availability investment risk management <i>"We believe that increased transparency, clarity around governance, and improved visibility of network delivery timelines will play a</i>	While the UR recognise the transparency in the publication of regular Network Delivery Portfolio updates, representing positive progress. The UR considers that continued improvements in the visibility of programme performance and associated risks will be important to ensure sufficient clarity and confidence in delivery timelines.	SONI and NIE Networks have committed to quarterly publication of updates on our Network Development Portfolio and providing additional information as part of these updates, improving transparency. Two quarterly updates have been published on the SONI website since the publication of the consultation on the draft TDPNI 2025-2034. In addition, SONI currently consulted on the form of the Ten Year Transmission Forecast Statement. The aim of the changes proposed is to provide relevant information on the Transmission System in a more useful way for prospective customers.

	key role in supporting the timely development of energy projects in Northern Ireland.”		We welcome industry feedback on this important statutory document such that it is a more useful information source going forward. The consultation closed on 3 July 2026. https://consult.soni.ltd.uk/consultation/refresh-ten-year-transmission-forecast-statement
<u>Strategic Misalignment with Statutory and Policy Targets</u>	[Renewable NI] RNI highlights a widening gap between the draft TDPNI and the NI Climate Change Act 2022, in relation to SONI’s strategic modelling and delivery timelines. <i>“Unless there is a material acceleration in transmission development and greater transparency around programme performance, Northern Ireland risks falling short of its statutory renewable electricity obligations.”</i>	The UR acknowledges concerns regarding alignment between statutory climate targets, system modelling and network delivery. We note that delivery of grid infrastructure is complex and acknowledge SONI’s position that a coordinated, whole-system approach is required to support delivery. UR also recognises that achieving the 80% RES-E target will depend not only on network development, but also on complementary operational, market and engagement measures.	As explained previously, it is important to note that delivery of new grid infrastructure does not solely lie with SONI; multiple parties contribute to the successful delivery of new projects, including NIE Networks, the UR, the Department for the Economy (DfE), the Department for Infrastructure (DfI), local councils, planners, landowners and host communities. SONI will continue to work with these parties through initiatives such as the DfE’s Grid Development Monitoring Group to identify ways to accelerate the delivery of new transmission infrastructure. As identified in Shaping Our Electricity Future (SOEF) v1.1, it is clear that new network has an important role to play in supporting Northern Ireland’s 80% target. However, SOEF also sets out three other pillars that are key to enabling the 80% target i.e. operational, market and engagement measures. Industry also have a role to play in supporting the 80% target. SOEF identified over 2 GW of new renewable

			generation required to support Northern Ireland's ambitious and challenging target. Shaping Our Electricity Future Roadmap Version 1.1
<u>Loss of Strategic Focus on 'Key Enabler' Projects</u>	[Renewable NI] RNI mentions that in previous TDPNIs, six key enabler projects critical to 2030 delivery have been identified with delayed timelines. RNI compares this to the current TDPNI which no longer re-affirms the list. Instead, RNI mentions that it shifts focus toward process rather than delivery. Instead, the advice is given for "<i>re-stating and updating the list</i>" RNI says this creates uncertainty about what SONI still considers essential and over what timeframe.	UR acknowledges concerns regarding the visibility of key enabling transmission projects and the importance of clearly identifying those critical to achieving 2030 targets. The UR recognises that these projects continue to form part of the wider Network Development Portfolio. However, the UR considers that maintaining clear visibility of strategically important projects, including their role and indicative timelines, remains important to support understanding and confidence.	With responsibilities to plan the Transmission System for Northern Ireland's future electricity needs, this includes supporting the integration of renewable generation, supporting economic growth and improving system resilience and security of supply. As such, renewable integration projects represent a subset of the overall Network Development Portfolio. Working together with NIE Networks through the JPMO, we have now set out how the full portfolio of transmission network reinforcements can be delivered over the course of the TDPNI period so that all industries can be transparently informed on all of the planned grid upgrades. The projects that were highlighted as key enablers in the TDPNI 2023-2032 are included in the draft TDPNI 2025-2034 and in the quarterly updates from JPMO. As such, all six renewable enabling projects are still being progressed, and we recognise their importance to delivering Northern Ireland's 80% RES-E target. This has not changed.
<u>Imbalance Between Asset Replacement</u>	[ABO Energy] ABO notes that out of around 150 TDPNI projects, only 45 are network	UR recognises the importance of an appropriate balance between asset replacement and network	Delivery of asset refurbishment is as important as the delivery of new infrastructure; a well maintained network removes potential

<u>and Network Development</u>	development projects, while the majority are asset replacements. While replacement is acknowledged as necessary, ABO argues, development projects are what actually unlock renewable capacity <i>“We would welcome continued visibility on how this balance is managed over time, particularly in the context of increasing demand for grid access.”</i>	development, including the role of development investment in enabling renewable capacity and supporting future demand. UR also recognises that asset replacement is a fundamental component of overall transmission investment, essential for maintaining security of supply, network resilience and system reliability. We consider that continued transparency on how this balance is managed over time will be important to support understanding, particularly in the context of increasing demand for grid access.	constraints imposed by asset condition and avoids outages due to equipment failure SONI notes that the UR approved over £2bn in NIE Networks’ RP7, highlighting the critical importance of ensuring the electricity network is maintained to ensure security of supply.
<u>System Constraints, Dispatch Down & Consumer Impact</u>	[Renewable NI] RNI devotes significant focus to dispatch down, 915 GWh of wind was dispatched down in 2024; with 30.5% of controllable wind output constrained. Therefore, it is estimated that there was £91m of lost revenue in 2024 alone. Persistent transmission delays (notably the North–South Interconnector) are identified as a primary barrier to reducing system constraints in NI.	UR recognises the increasing impact of dispatch down and system constraints, and the contribution of transmission limitations to these outcomes. UR acknowledges that these challenges are driven by a range of factors, including market conditions, interconnector constraints and wider system limitations. In particular,	Although outside the scope of the TDPNI consultation, SONI acknowledges the significant increase on the level of dispatch down in recent years. These levels of dispatch down are largely as a result of prevailing market conditions driving higher imports from EU/GB markets and constraints relating to the limitations on the existing North South interconnector. This constraint will not be resolved until the second North South Interconnector is energised. Despite legal

		constraints associated with the existing North-South Interconnector continue to be a key influencing factor. UR notes ongoing work from SONI to address these issues, including the development of the Dispatch Down Action Plan and continued progress on key transmission reinforcements. While some measures are being progressed in the shorter term, delivery of network infrastructure will remain central to reducing constraint levels over time.	challenges, construction of this has commenced in Northern Ireland and is expected to commence in the Republic of Ireland later this year. SONI has been proactive in engaging with stakeholders and industry on the present high levels of dispatch down, with several workshops held in recent years, communicating clearly the specific issues and challenges, and proposing solutions through the development of the Dispatch Down Action Plan. There is further engagement on this matter planned with industry on 29 June 2026.
	[Renewable NI] RNI states that tying firm access to completed reinforcements is no longer workable given delivery delays. <i>“This uncertainty discourages investment at the very stage when rapid deployment is essential to meeting statutory targets.”</i>	The UR acknowledges that delivery timelines can have implications for firm access arrangements and notes the need for clarity in how these are applied. The UR will continue to consider these issues within the relevant regulatory frameworks to ensure that arrangements remain appropriate in the context of evolving system needs and delivery timelines.	The purpose of the TDPNI is to outline transmission investments planned over the next ten years; issues relating to the calculation methodology for Firm Access Quantities (FAQ) will be dealt with in its own dedicated workstream, set out in SONI's Forward Work Plan 2025/26, which SONI is progressing in 2026. SONI's scope of work on FAQ relates to the calculation methodology and we are supporting the UR in their work to evaluate the FAQ policy we have in Northern Ireland.

