Utility Regulator

Eimear Watson
SONI Ltd
Castlereagh House
12 Manse Road
Belfast
BT6 9RT

By Email Only: Eimear.Watson@soni.ltd.uk

Date: 15/10/2026

Our Ref: NET/E/BM/1535

Dear Eimear,

Request for Authority's consent to extend the Connection Offer timeline for the TTEP Ballylumford Power Limited's Ballylumford Synchronous Condenser Project (MIC = 15 MW / Inertia = 4000 MWs / Reactive Power = + 281 MVAr / - 238 MVAr)

Thank you for your letter dated **1 October** 2026 **("the Letter")** setting out an application ("**the Application"**) made under Condition 25(5) of SONI's Transmission Licence (**"the Licence")** - seeking the Authority's[1] consent for the extension of the period for the making of an offer by SONI to a Connection Applicant, for the connection of a Synchronous Condenser Project ("***Sync Con***") MIC = 15 MW Inertia = 4000 MWs Reactive Power = + 281 MVAr / - 238 MVAr project at Ballylumford Power Station, Ballylumford, Islandmagee, Larne, Co. Antrim.

We start by setting out the relevant terms of Condition 25 of the Licence. We then move to the Application:

1. Condition 25 of the Licence.

Condition 25(5) provides, so far as relevant, as follows (our underlining added): *"[SONI] shall offer terms for [connection agreements] . . . as soon as practicable and (save where the Authority consents to a longer period,*

[1] In this correspondence we use the words "us" "we" "our" "UR" "Utility Regulator" and "Authority" interchangeably to refer to the Northern Ireland Authority for Utility Regulation.

which consent may be given on the application of [SONI] following consultation by [SONI] with the person making the application and such other persons as [SONI] considers may be affected or interested) in any event not more than the period specified in paragraph 7 after receipt by [SONI] of an application containing all such information as [SONI] may reasonably require for the purpose of formulating the terms of the offer …"

Condition 25(7) provides that the *"period specified"* in this case is three months, unless the Authority has consented to a longer period.

2. Background

The Connection Applicant's application for the connection offer was deemed effective on 17 July 2026 with SONI being due to offer a connection offer within three months. The basis of this application was *"There are currently no existing spare bays at Ballylumford 275 kV substation for the Sync Con to connect into that are not already allocated to other projects."* It additionally states, *"The lack of existing spare bays at Ballylumford 275 kV substation meant that SONI has had to consider a more complex alternative connection arrangement for the Sync Con to connect and this has taken additional time for SONI to determine. "*

SONI states of the existing bays;

- "One bay is allocated to TTEPBPL's 300 MW Battery Energy Storage System project. See SONI Connection Register;

- Two bays are allocated to the Moyle Reinforcement system project. See details in the 2024 Ten-Year Transmission Forecast Statement ("***TYTFS***"), the Transmission Development Plan Northern Ireland ("***TDPNI***") 2025-2034 and the 'Projects in Your Area' section of the SONI website; and

- Two bays are allocated for offshore projects. See details in the 2024 TYTFS. "

SONI has stated that *"the proposed connection arrangement identified involves a single 275 kV cable from the Sync Con substation site to a new switching station near to the existing Ballylumford 275 kV substation which will loop into one of the circuits in the existing Ballylumford - Ballycronanmore - Hannahstown double circuit."*

SONI has also highlighted *"that significant internal resources and key relevant staff that are involved with this connection have had to be redirected to ensure legal compliance with SONI's obligations under the Environmental Information Regulations 2004 ("**EIR**") due to several information requests being submitted to SONI under the EIR, including one from TTEPBPL requesting information in relation to reservation of connection bays at Ballylumford 275kV Substation."*

SONI is therefore requesting an extension of the Ballylumford Synchronous Condenser Project connection offer date from **15 October[2] 2026** to **17 December 2026.**

SONI outlines the requested extension period as outlined below;

- *"Additional circa 1.5 months required due to technical complexities for SONI to determine connection arrangement, interact with NIE Networks and draft and submit Construction Application.*

- *Additional circa 0.5 months required due to technical complexities for NIE Networks to produce the associated Construction Offer.*

- *Therefore, an overall additional period of circa 2 months is being requested."*

SONI has additionally *"considered whether there are any alternative actions that could allow SONI to issue the Connection Offer to the Customer on or before the 15 October 2026. SONI has concluded that there are no such actions." SONI states that, without* an extension *"SONI would not be able to issue a Connection Offer on 15 October 2026. Rather than be non-compliant with Condition 25(5) of the Licence, SONI would have to refuse to make the Connection Offer under Condition 25(6) of the Licence."*

4. Consultation associated with the Application

Condition 25(5) of the Licence requires SONI to provide a connection offer as soon as practicable "save where the Authority consents to a longer period, which consent may be given on the application of the Licensee

[2] We note that the Application uses 15 October 2026 as the "start" date of the extension requested. This is incorrect. C 25 provides for a connection offer to be made as soon as practicable and in any event, within 3 months of a compliant application. SONI deemed the application effective on 17 July 2026. That means that the "true" start date in this case is 17 October 2026. Nothing turns on this clarification.

following consultation by the Licensee with "…the person making the application for connection, and such other persons as [SONI] considers may be affected or interested." [Emphasis added]

Further, our decision paper titled 'Review of Electricity Distribution and Transmission Connections Policy' and published on 31 May 2017 **("the Decision Paper Guidance")** provides that "we expect the Licensee to consult adequately and in a timely manner with affected parties."

Consultation with the Connection Applicant

The Connection Applicant emailed SONI on 25 August 2026 stating, *"On the call on Friday 21st August, SONI advised of a potential delay to the Ballylumford Synchronous Condenser Connection Offer due to requiring further investigation of a perceived lack of available connection bays in the Ballylumford 275 kV Substation due to suggested reservations of the three currently unused bays for: (i) development works associated with the Moyle connection reinforcement; and (ii) potential future offshore."*

SONI followed up with the Connection Applicant on 4 September 2026 by email, stating *"To clarify, on the call on Friday 21 Aug, SONI advised that it would be seeking the consent of the Utility Regulator for additional time to issue the Connection Offer, however, we are still in the process of determining what the length of that may need to be. SONI will follow the normal process to consult affected parties on the timeline whenever this becomes clear, and we would view the call on Friday as the initial part of that consultation of making you aware that an extension will be sought."*

The Connection Applicant responded by letter dated 4 September 2026, raising concerns regarding SONI's indication that connection bays at Ballylumford 275 kV Substation were unavailable for the proposed Ballylumford Synchronous Condenser project. The Connection Applicant requested clarification as to whether SONI intended to issue a connection offer within the three-month period required under Condition 25 of the SONI Licence or apply to the Utility Regulator for an extension, and if so, the legal and technical basis for any such application.

The Connection Applicant disputed SONI's position that existing bays were reserved for future offshore wind developments and the Moyle Interconnector reinforcement project, arguing that there was no clear legal, regulatory or contractual basis for such reservations. The Connection Applicant further requested evidence supporting the alleged bay

reservations, details of the Moyle reinforcement project, and information relating to fault level constraints discussed during the meeting of 21 August 2026.

The Connection Applicant also raised concerns regarding compliance with SONI's non-discrimination obligations and the requirement to provide the least cost technically acceptable connection solution, contending that the use of existing available bays should be assessed as part of the connection studies.

The letter concluded by requesting written responses to several technical, regulatory and procedural questions and seeking confirmation that work on the connection application would continue pending SONI's response. SONI responded to the queries set out in the letter in an email response on the 1 October 2026.

SONI sent an email regarding the Condition 25 extension application, consulting with the Connection Applicant at 8pm on 1st October 2026 at 8:00pm. When an 'out of office' reply was received, another email was sent to a different individual at 8.07pm. The Application was subsequently received by UR at 9:26pm on 1 October 2026.

The Connection Applicant responded on the 6 October 2026 in a letter stating *"We recognise the challenges facing SONI to complete a Connection Offer under the obligatory 90 day timeline and to meet the obligations of delivering the Least Cost Technically Acceptable Connection Design (LCTA) under the SONI Transmission Connection Charging Methodology Statement (TCCMS). We also recognise and welcome the work undertaken by SONI and NIE Networks to propose a feasible solution to the connection application within the timescales required by the LCIS phase 2 tender process, currently scheduled to take place in January 2027."*

The Connection Applicant *"SONI requested comment on the application for an extension to the timescales on which SONI is required to issue a connection offer. TTEP understand this delay is a result of SONIs determination that a connection to the existing unoccupied bays in the 275kV substation is not possible and additional time is required to develop their proposed solution to loop into one of the circuits in the existing Ballylumford - Ballycronanmore - Hannahstown double circuit."*

The Connection Applicant raised concerns that *"reserving the bays at Ballylumford for a speculative future wind development will result in a suboptimal connection arrangement for the synchronous condenser and we reserve all rights with respect to this."*

The Connection Applicant concluded by stating *"notwithstanding [The Connection Applicant] disagree[s] on the availability of the existing bays, we do not object to the alternative connection arrangement proposed by SONI and the extended timelines for the Connection Offer, to receive an offer no later than 17th December 2026."*

Consultation with the NIE Networks

SONI emailed NIE Networks on 25 September 2026 with revised offer timelines confirming that it was "*submitting the Construction Application next Friday 3 Oct (as 3rd falls on a Saturday) and the Construction Offer being submitted on 3 Dec:"*

NIE Networks responded on 28 September 2026 stating that *"The timeline you present below looks fine and can confirm we have no objection."*

SONI further emailed NIE Networks at 4.16pm on 1 October 2026 stating *"SONI is therefore making an application under Condition 25(5) of the SONI Licence to extend the current period within which SONI is required to issue a connection offer to TTEP Ballylumford Power Limited."*

However, NIE Networks responded to this email at 4.36pm on 1 October 2026 stating *"NIE Networks have no objections to the timeline detailed below, nor to SONI seeking an extension."*

Our view on the consultation process

We consider that SONI could have provided adequate time for the Connection Applicant to respond, so that the Connection Applicant's response could have been provided as part of the Condition 25(5) application.

Going forward, we would expect consultation to be undertaken sufficiently in advance of a Condition 25(5) application being submitted to the Authority to allow affected parties adequate time to review and respond, and for any responses received to be properly considered as part of the application process.

In our view, consultation should generally take place at least one week prior to the submission of an application, unless there are exceptional circumstances which provide the affected parties with reasonable time to provide any relevant information to the decision maker.

5. The Authority's decision

We judge the Application against: (i) our principal objective and general duties set out in Article 12 of the Energy (NI) Order 2003; and (ii) the published Decision Paper Guidance.[3]

Having considered the matter fully as a request under Condition 25 of SONIs Transmission Licence and taken all relevant matters into account (to include, importantly, the fact that the Connection Applicant did not object to the extension sought), the Authority:

(i) accedes to the Application, considering it properly founded and (accordingly);

(ii) gives consent to an extension to **17 December 2026** for the purposes of Condition 25(5) as regards the Connection Application made by the Connection Applicant for the connection of Ballylumford Synchronous Condenser Project (MIC = 15 MW / Inertia = 4000 MWs / Reactive Power = + 281 MVAr / - 238 MVAr).

It is reasonable that SONI has requested additional time to provide a relevant connection offer to the Connection Applicant. Without an extension the applicant would (likely) not receive an offer. We also note that SONI's resources have had to be reallocated to advance the EIR request submitted on behalf of the Connection Applicant.

Given the technical complexities to determine a connection arrangement, and to enable SONI to interact with NIE Networks, draft and submit Construction Application, a circa 2-month extension to provide an offer is considered justifiable.

In making this decision we have had proper regard to the consultation undertaken by SONI in accordance with Condition 25(5) and considered the Connection Applicants response, to include, most importantly, its lack of

[3] Electricity Connections Decision FINAL.pdf (uregni.gov.uk).

objection to the Application

We remind SONI that the grant of consent (for an extension of time) relayed in this letter does not absolve SONI of its Condition 25 obligation to make a connection offer to the Connection Applicant as soon as practicable.

The newly substituted Condition 25 period does not affect that key licence obligation. SONI should particularly consider if any of the other potential options for connection would allow for the making of a connection offer earlier than **17 December 2026.**

We also encourage SONI to continue to engage with the Connection Applicant in a meaningful manner, noting the nature of past engagement from the applicant.

This decision shall be published and placed in the Electricity Register.

We trust this is satisfactory. If you have any queries, please contact Jody O'Boyle.

Yours sincerely,



Brian Mulhern
Director of Networks
Duly authorised by the Authority