

SONI Preliminary Work Activities for the Introduction of Contestability

The Utility Regulator (UR) has requested that SONI and NIE submit a preliminary work plan for the introduction of contestability in connections in Northern Ireland. This outlines, at a high level, the work activities that SONI foresees its input is required to introduce contestability for the transmission aspect of connections. This is a preliminary work programme estimated using the assumptions below and is subject to change when SONI have the opportunity to review the UR Final Next Steps Paper and also as the work progresses. It is important to note that contestability in transmission connections cannot be implemented without both SONI and NIE TAO having all requirements in place.

The following points have been assumed in producing this work plan.

- The UR publishing the Final Next Steps Paper on the Introduction of Contestability at the start of July 2015.
- SONI assume that funding has been secured from UR before commencing Items 3-14 below.
- SONI Licence modifications are published for consultation by UR in December 2015.
- An IT system which would allow information on contestable projects to be shared between TSO, TAO and applicant may not be essential in implementing contestability but may make the process more efficient. This task has been excluded from this preliminary plan.
- Rebating between distribution and transmission applicants would help with the implementation of contestability but is not under SONI's control and has not been included in this preliminary plan.
- The interaction of the introduction of contestability for distribution connections is not considered in SONI's work plan. However if transmission and distribution decisions and activities are to be co-ordinated this may have a significant impact on timelines.
- The accreditation work stream will require a lot of input from NIE TAO and may require public consultation. It is not envisaged that this is a continuous piece of work but links into work streams 7 and 13.

Item	Task	Description	Estimated No. Months Required	External Dependencies
1	Review of UR Final Next Steps Paper	Review Utility Regulator's Next Steps Paper on the Introduction of Contestability and edit preliminary work programme as necessary.	1	
2	Request and secure Funding	Request and secure funding for work required by SONI to implement contestability	1	UR
3	Develop Implementation Guidelines	Develop Implementation Guidelines document detailing how the principles of contestability will be applied for transmission connections. To cover items such as definition of contestable and non-contestable activities, ownership boundaries etc. Consider eligibility criteria for connections already in progress to	2	NIE TAO UR Working Group

		contest the remainder of their connection delivery.		
4	Develop Connection Offer Process	Develop connection offer process for contestable transmission connections.	4	NIE TAO
5	Develop Connection Delivery Process	Develop connection delivery process for contested transmission connections. To cover items such as: <ul style="list-style-type: none"> - How interactions between applicant, TSO and TAO should operate - Review processes - How handover between pre-construction and construction of contested assets is managed. - Commissioning and handover process 	4	NIE TAO
6	Develop TIA Processes	Develop TIA processes to allow for contestability in transmission connections. To include: <ul style="list-style-type: none"> - Process whereby SONI can request TAO costs for overseeing the contested elements of a connection - Process whereby SONI can request TAO costs for the non-contested elements of a connection and the non-contestable elements of a connection - Develop TIA arrangements to make provision for any additional information required by SONI from the TAO for contestable connections Revising the TIA will require UR approval.	4	UR NIE TAO
7	Develop Connection Offer and Connection Agreements	Update current form of connection offer to provide for contestability. Update current form of Connection Agreement to provide for contestability covering the following: <ul style="list-style-type: none"> - Relationships and interactions between the applicant, TSO and TAO - Transfer of contested assets - Insurances, warranties and liabilities - Repair of contested assets - How O&M costs are calculated for contested assets - Contested assets spares management and training - Safety requirements during construction and at handover - Agreement to provide for contested and shared transmission connection assets, making provision for clusters. 	4	NIE TAO

		<ul style="list-style-type: none"> - Agreement and charging arrangements on how System Operator preferred and customer preferred connection methods are contested. 		
8	Update SONI Transmission Connection Charging Methodology Statement	<p>Update SONI Transmission Connection Charging Methodology Statement to provide for contestability covering:</p> <ul style="list-style-type: none"> - TSO costs for overseeing contestable connections - TAO costs for overseeing contestable connections (may form part of NIE Transmission Charging Statement) - How to share the cost of shared connection assets that are contested - How to manage the total cost of shared connection assets that are contested if all parties do not proceed <p>Revising the charging statement will require public consultation and UR approval.</p>	4	UR NIE TAO
9	Develop specifications	<p>Agree interface with NIE for creation of policies and specifications. Create necessary policies and specifications. SONI responsible for input on pre-construction activities.</p>	11	NIE TAO
10	Grid Code review	<p>Ensure Grid Code is still fit for purpose with the introduction of contestable connections. Propose changes to Grid Code Review panel. This will require public consultation and UR approval.</p>	2	UR
11	Planning Standards review	<p>Ensure Planning Standards are still fit for purpose with the introduction of contestable connections. Draft changes as necessary. This will require public consultation and UR approval.</p>	2	UR
12	Legal Review of Connection Offer and Agreement	<p>Review of changes to charging policy, connection offer, connection agreement etc.</p>	1	
13	Overall legal review of process and contracts	<p>Legal review of all changes to SONI connection documentation and charging methodologies.</p>	5	
14	Review proposed Licence Modifications	<p>Review changes proposed to SONI Licence.</p>	1	UR
15	Accreditation	<p>Review if there are SONI specific requirements for a party to be accredited. If there are SONI specific requirements for a party to be</p>	8	NIE TAO UR

	accredited, verify if the Lloyd's accreditation scheme meets any SONI as required by UR.		
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SONI Preliminary Work Programme for the Introduction of Contestability

Item	2015						2016							
	J	A	S	O	N	D	J	F	M	A	M	J	J	A
1	Review of UR Final Next Steps Paper													
2	Request and secure Funding													
3	Develop Implementation Guidelines													
4	Develop Connection Offer Process													
5	Develop Connection Delivery Process													
6	Develop TIA Processes													
7	Develop Connection Offer and Connection Agreements													
8	Update SONI Transmission Connection Charging Methodology Statement													
9	Develop specifications													
10	Grid Code review													
11	Planning Standards review													
12	Legal Review Connection Offer and Agreement													
13	Overall review process and contracts													
14	Review proposed Licence Modifications													
15	Accreditation													

	SONI Responsibility
	Joint SONI and NIE Responsibility (NIE TAO)
	SONI Responsibility dependent on UR
	UR activity with SONI support
	UR approval
	Public consultation