



Consultation on SONI's Draft Transmission Development Plan for Northern Ireland 2019-28

SSE Response

5 May 2020



Introduction

SSE welcomes the opportunity to respond to the Utility Regulators consultation on SONI's Draft Transmission Development Plan for Northern Ireland 2019-28.

SSE is proud to be the largest renewable electricity developer on the island of Ireland, we own and operate over 2,000MW of generation capacity on the island of Ireland, with 740MW coming from our 29 onshore wind farms, with plans for over 400MW of on-shore development and a number of off-shore wind farm development opportunities. We are also one of Ireland's largest energy providers, supplying around 700,000 customers on the island.

SSE is of the view that this draft Transmission Development Plan for Northern Ireland (TDPNI) does not sufficiently meet the needs of stakeholders as the data used is already out of date.

SSE response

The Utility Regulator has requested views on the draft TDPNI rather than asking for specific responses from stakeholders. Therefore, this response addresses the high-level concerns from SSE in respect of the draft TDPNI as published by SONI.

Whilst we recognise the difficulty in preparing the TDPNI covering the next 10 years, the inability to provide sufficient relevant information in relation to the development of the transmission network in NI has the potential to undermine investor confidence and can have a detrimental impact on the market going forward.

SSE is disappointed that more relevant and up-to-date information could not be made available, and therefore calls into question the value to market participants of the draft TDPNI. SSE's key concern is on the period covered by the draft TDPNI, namely 2019 – 28. It is also of concern that a data freeze was applied from 1 January 2019, therefore the data referenced here is already 16 months old.

With a data freeze of 2019 we are confused as to how this meets the requirement of condition 40(1)(a) which states that the TDPNI shall in particular "indicate to market participants the main transmission infrastructure that needs to be built or upgraded **over the next ten years**" (emphasis added). It should also be noted that Directive 2009/72/EC makes the same requirement in relation to the next ten years.

When introducing this licence condition, the Utility Regulator set out that "An effective network development plan will better aid decision making for connecting customers to support more efficient investment." Additionally, the Utility Regulator also acknowledged that "the information also provides relevant information for the regulator to inform its regulatory decision making"

SSE agrees with the rationale of the Utility Regulator set out above, however does not agree that this proposed TDPNI is effective, given that 16 months have already passed since the data freeze. SSE is of the view that this is not as useful as a forward looking 10-year development plan.



Concluding Remarks

Given this draft TDPNI does not cover, at a minimum, 2020 – 2030 it is unclear how this meets the relevant requirements and effectively reduces the usefulness of this draft TDPNI to stakeholders.

SSE is of the view that the Utility Regulators initial rationale for introducing the requirement to develop a forward looking TDPNI is still relevant today. Failure to provide a forward looking 10 year plan has the potential to undermine both future development opportunities and ability of the Utility Regulator to inform its own regulatory decision making.