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Jody O'Boyle  
Manager Network Operations  
Northern Ireland Authority for Utility Regulation  
Queens House  
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30 August 2018

**Consultation on Modifications to TIA Licence Conditions**

Dear Jody,

We are writing in response to your Notice under Article 14 (2) of the Electricity (Northern Ireland) Order 1992 and the associated consultation paper. We welcome the opportunity to review these proposed modifications, and have considered the reasons and effects of these changes to Condition 18 of our TSO licence as set out in Annex 2 of your paper.

We welcome the confirmation provided by the proposed modification to paragraph 3 of Condition 18, which further strengthens SONI's ability to charge the costs associated with pre-construction activities on to NIE Networks. This both implements the CMA order, and ensures appropriate intergenerational treatment in charges for use of the transmission system in Northern Ireland.

SONI notes that the changes proposed to paragraphs 5 and 8(c) have the effect of aligning the licence condition with the current approved drafting of the TIA. We therefore view these as administrative modifications and welcome the consistency that these bring.

SONI does not consider the changes to paragraph 10, and the associated definition, to be strictly necessary. While the current wording provides important reassurance that the TIA should remain consistent with the Certification Decision, this modification creates wider ranging powers than those currently available to the Utility Regulator.

SONI would welcome wording in the decision paper that provides reassurance that these new powers will be used in a way that is consistent with the current TSO Certification decision, the obligations and duties set out in statute and also in the

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licences to participate in transmission in Northern Ireland. With the appropriate assurances in place, SONI would not object to this amendment.

As always, we remain available to discuss this response with you.

Yours sincerely

A handwritten signature in blue ink, appearing to read "S Friedel". The signature is fluid and cursive, with a large initial "S" and a clear "Friedel" following.

Sarah Friedel

CC: Aidan Girvan, Utility Regulator