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Daniel McCrossan MLA
Chair of the Public Accounts Committee
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Date: 21 August 2026

Dear Mr McCrossan MLA,

Inquiry on Northern Ireland Energy Strategy

SONI welcomes the opportunity to provide a submission to the Northern Ireland Assembly Public Accounts Committee in response to its Inquiry into the findings of the Northern Ireland Audit Office report *Northern Ireland Energy Strategy*, published on 21st October 2025.

SONI views the Energy Strategy as an important and positive framework. It has helped provide direction, focus and a shared ambition for the transformation of Northern Ireland's electricity system. The key task now is to translate that ambition into coordinated delivery, so that Northern Ireland can unlock the economic, energy security, consumer and decarbonisation benefits of its significant renewable energy resources.

Please find below comments in response to the five questions set by the Committee. While the Energy Strategy contains three headline targets, SONI's statutory role and remit is most directly engaged by supporting delivery of the target to achieve at least 80% renewable electricity consumption by 2030. Our comments should therefore be read in that context as they focus primarily on the electricity transmission system actions SONI can undertake within our remit, opportunities and challenges, and the wider system and societal enablers required to deliver that target.

About SONI

As Northern Ireland's electricity Transmission System Operator (TSO), licensed and regulated by the Utility Regulator, we have the dual role of meeting Northern Ireland's energy needs today and planning to ensure Northern Ireland's future energy needs can be met. We do this in close collaboration with stakeholders across the electricity and gas industries.

Every second of every day, our team of experienced, expert engineers manage the electricity grid to ensure power can flow safely, securely and reliably from where it is generated to homes, businesses and public services across Northern Ireland.

At the same time, we have the crucial task of transforming the electricity system and how we operate it in an unprecedented way to meet Northern Ireland's collective renewable energy and climate change targets.

We also work with EirGrid, our counterpart in the Republic of Ireland, to operate the All-Island Single Electricity Market.

SONI's role is to operate and plan the electricity transmission system, not to set policy. We do not generate or sell electricity, and we do not own the electricity network assets. Rather we balance consumer electricity demand with the generation made available by the companies who produce it. As such, we have no vested interest other than to deliver the best solutions for Northern Ireland's energy

future and for the consumers who ultimately invest in that future. In this respect, and as a data driven organisation, this enables SONI to act as an impartial, trusted adviser to government and regulators. Within that remit, SONI is committed to leading where we have responsibility, supporting government and regulators with impartial technical advice, and working collaboratively across the sector to deliver practical solutions.

Q1 Has the Energy Strategy and its implementation had a positive, negative or mixed impact on your sector?

Northern Ireland has a strong track record in renewable electricity integration. The system met its previous 40% renewable electricity target in 2019, one year ahead of schedule, and in 2022 the power system here was among the first in the world capable of operating with up to 75% of electricity flowing through the grid at any point in time coming from variable renewable sources. These successes demonstrate what can be achieved through innovation, partnership and clear policy direction.

From SONI's perspective, the Energy Strategy provides an important framework for progressing Northern Ireland's energy transition. The target of achieving at least 80% renewable electricity consumption by 2030 has provided an important policy signal and has brought into focus the collective effort needed across government, regulation, industry and the public to deliver the scale of transformation required.

In response to the NI Energy Strategy (2021) and subsequent target of 80% renewable electricity by 2030 in the Climate Change (Northern Ireland) Act 2022, SONI developed and published "*Shaping Our Electricity Future Version 1.1*", our roadmap to signal the actions and investments needed across four interlinked workstreams in order to future-proof the electricity system so it can securely and reliably support Northern Ireland's cleaner energy future.

This roadmap sets out actions within SONI's remit and includes operational transformation, critical grid upgrades, evolving market arrangements and transforming how we engage. We continue to make progress across all four workstreams and this is helping to increase the amount of renewable electricity that can be safely and securely accommodated on Northern Ireland's electricity system. Together these actions are an essential part of the pathway to 80%, but achievement of the target also depends on wider system and societal enablers.

These critical enablers include:

- planning, consenting, legal, and delivery processes that enable transmission and enabling infrastructure projects to progress at pace;
- efficient connection, commissioning and operation of new private sector projects spanning renewable generation, storage and flexibility solutions;
- flexible demand growth that enables maximum utilisation of variable renewable energy where and when it is generated; and
- market and policy frameworks that support high renewable penetration and demand flexibility while preserving security and affordability.

The Energy Strategy is positive in its ambition and direction. SONI continues to actively support the Department for the Economy on a number of initiatives associated with the Energy Strategy including the Renewable Electricity Price Guarantee Scheme, offshore renewable energy, the Grid Development Monitoring Group and the 80 x 30 workstream.

The focus now must be on deeper collaboration and accelerated and coordinated action across industry, government and communities to realise this ambition and in the long-term interests of consumers.

Q2 What impact, if any, is the current Energy Strategy having on investment decisions within your sector, including business confidence and future investment planning?

From SONI's perspective, the Strategy has created a clearer basis for our own future planning. As outlined above, our published roadmap, *Shaping Our Electricity Future Version 1.1*, sets out the actions required across four interlinked workstreams: system operations, transmission grid infrastructure, markets and engagement to help future-proof the electricity system so it can securely and reliably support Northern Ireland's cleaner energy future.

We remain focused on delivering the actions set out in this roadmap. We have implemented operational changes to reduce the need for fossil-fuelled generation to be dispatched for system stability. We have procured synchronous condensers (large machines which provide inertia services which are essential for system stability), and we have introduced advanced tools in our control centre. We are carrying out an assessment of future flexibility needs. We continue to progress critical transmission infrastructure projects, including the North South Interconnector despite ongoing legal challenges, and undertake preparatory work to support new market and policy mechanisms such as the Renewable Electricity Price Guarantee Scheme. We are also delivering a number of All island programmes (in conjunction with EirGrid in Ireland) to implement a series of Single Electricity Market Committee decisions. Together, these actions are helping to increase the amount of renewable electricity that can be safely and secured accommodated on Northern Ireland's electricity system.

Grid development supports inward investment, renewable generation, electrification, demand growth opportunities, industrial decarbonisation and security of supply. We recognise that business confidence and future investment planning also depend on certainty in respect of the delivery environment and timelines. Investors need confidence that renewable generation, storage and flexibility projects can connect to the system in a timely and efficient way. We have recently published and consulted on our draft Ten-Year Development Plan 2025-2034 for Northern Ireland (TDPNI). This TDPNI is SONI's transmission investment plan for the next decade and sets out over £1bn of investment in the transmission system. It identifies the grid reinforcements, new connections and asset renewal projects required to maintain security of supply, increase renewable integration and support the longer-term transformation of the electricity system needed to enable delivery of the renewable electricity targets in the Northern Ireland Energy Strategy. This plan also provides visibility for potential investors by setting out the transmission projects and investment required over the next decade.

Delivering transmission infrastructure is complex and timelines are influenced by a range of factors including the policy and regulatory environment, planning and consenting, public acceptance and land access, as well as global supply chain constraints (for example increasing lead times for transformers and switchgear). These challenges are not unique to Northern Ireland, with comparable jurisdictions experiencing long lead times for permitting and construction.

To respond to this increasingly complex environment, SONI has introduced a number of initiatives, including closer joint working with our partners, NIE Networks, through the establishment of a Joint Programme Management Office, to provide greater certainty over grid infrastructure timelines and we are committed to accelerating projects where possible.

Q3 Are there aspects of the current policy, regulatory or infrastructure environment that are supporting investment or creating barriers to investment?

There are important elements of the current environment that support investment. The Energy Strategy, the 80% renewable electricity target and the Climate Change Act provide a strong policy signal. The Department for the Economy's work on the Renewable Electricity Price Guarantee Scheme, offshore renewable energy, the Grid Development Monitoring Group and the 80 x 30 workstream also provides important structures through which delivery issues can be progressed.

SONI also welcomes the recent publication of the *Interconnection Policy Statement: Policy Direction for East-West Electricity Infrastructure* and the commitment in the Energy Strategy Action Plan 2026 to publication of an Energy Storage Policy Statement. In our impartial technical advisor role, we are also keen to work with the Department for Economy on the development of an electricity demand strategy with clear targets to increase the electrification of heat, transport and industry. With increasing interest from developers in data centres, this should also include a policy on large energy users, learning from policy development in other jurisdictions.

Grid capacity and network development are critical enablers of investment and economic growth. Achieving Northern Ireland's renewable electricity and climate targets requires unprecedented transformation in how we operate the system and in the scale of grid infrastructure upgrades and new build. Major projects such as the North South Interconnector, the Mid Antrim Upgrade and Roe Cluster are critical to unlocking greater renewable generation, supporting economic growth and delivering consumer benefit.

The current legislative and regulatory framework is designed to ensure that connection applicants - regardless of technology type, size or location - are treated without undue discrimination. These arrangements have been in place for a considerable time period and were based primarily on accommodating connection of large thermal power stations. In practice, SONI's obligations under the Energy Order and its TSO licence require it to make connection offers to applicants who seek to connect on a first-come, first-served basis. The existing framework has served an important purpose, but the scale and urgency of the transition now require a more coordinated, plan-led approach.

Under the existing framework, grid development is led by individual connection applications, with limited ability to plan strategically to ensure the right technologies are in the right locations. Moving to a more plan-led approach, as is happening in GB, would support more timely, efficient and cost-effective delivery that is better aligned with government targets, system needs and consumer benefit. If Northern Ireland is to deliver grid infrastructure in a more coordinated, strategic and consumer-efficient way, there is merit in considering whether the current statutory and regulatory framework provides the most effective basis for anticipatory investment, coordinated connection processes and strategic prioritisation aligned to energy policy objectives.

Planning, consenting and land access remain critical delivery issues. Transmission infrastructure is complex and can take many years to plan, consent and build, as demonstrated across the Republic of Ireland, GB and Europe. Timelines are affected by planning processes, legal challenges, public acceptance, landowner consent and the need to procure long-lead equipment such as transformers and switchgear at a time of increased global demand as electricity systems around the world are upgraded at pace.

We continue to monitor the impact of the Planning and Infrastructure Act in GB and the [Accelerating Infrastructure – Report and Action Plan](#) in the Republic of Ireland in progressing critical electricity transmission projects to meet the urgency of the energy transition.

Regulatory frameworks must continue to protect consumers while also enabling future-focused investment. There is a strong case for risk-based anticipatory investment in project planning, design and the advance procurement of critical components where there is clear evidence of future need. Without this, Northern Ireland risks delaying necessary infrastructure investments.

Public acceptance and community confidence are also essential. Host communities and landowners play a critical role in enabling grid infrastructure. SONI has strengthened its engagement approach, including through a Community Forum Framework and early-stage participation models such as Citizen Sounding Boards. We have also worked with the Utility Regulator on improved landowner compensation and continue to work with the Utility Regulator and Department for the Economy to build support for the development of a community benefit model for critical transmission infrastructure, similar to approaches already established in neighbouring jurisdictions.

We would also be fully supportive of, and committed to playing our part in, a Northern Ireland Executive-led public hearts and minds campaign to build public understanding and support for the energy transition.

Q4 Does the current pace of delivery under the Energy Strategy provide sufficient certainty for businesses to plan and invest?

The Energy Strategy provides policy direction, but there is a need now to focus on enhanced collaboration on specific energy policy decisions and associated accelerated delivery.

SONI is progressing a number of actions within its remit to help support delivery of the 80 by 30 target. We are implementing changes to how we operate the system under our Operational Policy Roadmap which analysis shows could deliver £3.8bn ¹in savings to the Northern Ireland economy up to 2050. We are continuing to implement our Dispatch Down Action Plan to reduce constraints on renewable generation. We have reduced the need for conventional fossil-fuelled generation to be dispatched for system security reasons. We are progressing the delivery of synchronous condensers in the North West. We have introduced advanced scheduling and dispatch systems, are assessing future flexibility needs, including the role of long duration energy storage, and we are working with NIE Networks through the Joint Programme Management Office to strengthen transparency and delivery discipline across the transmission project portfolio.

These are important and necessary actions, but they are not sufficient on their own. Delivering the Energy Strategy requires a whole-system, whole society approach. Achieving the 80 by 30 target in a cost-effective way requires government, industry and society to be working closely together to ensure there is a coordinated plan led approach that is underpinned by an enabling policy, planning, consenting, regulatory, market and delivery environment, and that the energy transition has the consent and support of the people of Northern Ireland.

The Energy Strategy provides an important framework. Delivery requires deeper collaboration and accelerated action and the application of learning from the approach in neighbouring jurisdictions who are all seeking to address these challenges and unlock the significant opportunities from the energy transition.

Q5 Are there any particular implementation issues the Committee should be aware of when considering the effectiveness of the Energy Strategy?

As outlined above the delivery of the Energy Strategy and the wider energy transition requires a whole-system, whole society approach. Achieving the 80% renewable electricity target requires coordinated progress across system operations, transmission infrastructure, generation connections, storage, flexibility, market arrangements, planning, regulation, consumer demand and public engagement. SONI is committed to leading and supporting the areas within its remit and supporting a wider coordinated plan, but successful delivery depends on partnership working and deep collaboration across industry, government and society.

The energy transition requires unprecedented levels of grid upgrades and new infrastructure. Neighbouring jurisdictions are implementing plans to accelerate infrastructure delivery. It is important that in Northern Ireland we also focus on how critical electricity infrastructure can be accelerated while maintaining appropriate scrutiny, environmental protection and consumer safeguards.

The current developer-led, first-come, first-served model is increasingly misaligned with the scale and urgency of the energy transition. Moving towards a more plan-led approach to grid development and connections would help ensure that the right technologies are developed in the right locations, reduce avoidable constraints and support more timely and cost-effective delivery.

The Committee should also be aware that the energy transition must be managed alongside the ongoing need to maintain security of supply. Northern Ireland remains dependent on a relatively small number of large thermal power stations, and annual run-hour limitations applying to some plant are one of a number of factors that reinforce the need for careful coordination as new generation capacity, flexibility, storage, interconnection and demand-side solutions are developed.

Emerging interest in data centre growth, at a scale not envisaged when the Energy Strategy was developed, is an economic opportunity but also requires clear policy consideration and close collaboration between government, regulators, SONI, industry and prospective investors. This will help ensure that new demand is accommodated in a way that supports economic development, protects consumers and maintains security of supply.

SONI remains committed to continuing to work with government, the Utility Regulator and industry on these important issues.

Conclusion

The Energy Strategy provides an important and welcome framework for progressing Northern Ireland's renewable electricity and net zero ambitions. As Northern Ireland's electricity Transmission System Operator, SONI is fully committed to playing its part by operating the system safely and securely today, planning the transmission network needed for the future, supporting efficient market arrangements and providing impartial, data-driven advice to government and regulators.

In practical terms, the next phase of Energy Strategy implementation should focus on a small number of shared delivery priorities:

- coordinated, plan-led electricity infrastructure development;
- timely planning, consenting and land access;
- policy clarity on demand growth, large energy users, storage and electrification;
- market and regulatory arrangements that enable flexibility and security of supply;
- stronger public understanding and community confidence;
- sustained institutional capacity across the delivery ecosystem.

The Energy Strategy provides the framework. The priority now must be to accelerate coordinated delivery. SONI will continue working collaboratively with government, the Utility Regulator, NIE Networks, industry, and wider stakeholders to help deliver a secure, affordable and cleaner electricity system that supports consumers, communities and economic growth across Northern Ireland.

SONI would like to thank the Public Accounts Committee for its interest in this important issue and for the opportunity to submit our assessment. We remain available to provide any further information or clarification that the Committee may find helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alan Campbell".

Alan Campbell
SONI Chief Executive