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Castlereagh House
12 Manse Road, Belfast BT6 9RT

To:
Peter McCallion
Clerk to the Committee for the Economy
Northern Ireland Assembly

Date: 30 June 2026

Subject: Utility Regulator (Support for Decarbonisation Preparation) Bill – SONI Response to Call for Evidence

Dear Peter,

SONI welcomes the opportunity to provide evidence to the Committee for the Economy on the Utility Regulator (Support for Decarbonisation Preparation) Bill.

SONI supports the overall objective of the Bill to strengthen the ability of the Utility Regulator (UR) to support the Department for the Economy (DfE) in delivering Northern Ireland's decarbonisation ambitions under the Climate Change Act (NI) 2022. As Northern Ireland's Transmission System Operator, SONI recognises the importance of ensuring that policy development is informed by robust technical expertise and evidence.

SONI responded to the Department's consultation on the draft Bill in August 2024 (enclosed). While we welcome the progression of the legislation, we note that a number of key issues raised in our previous response do not appear to have been fully addressed in the current drafting. We consider that further clarification and refinement in these areas would support effective implementation of the Bill and minimise the risk of unintended impacts on delivery of decarbonisation objectives.

1. Scope and nature of requests (Clauses 1(1) and 1(2))

The Bill provides the UR with powers to offer advice, information and assistance to the Department, alongside a qualified duty to comply with requests. While SONI supports this framework, the legislation does not provide clarity on the expected scope and nature of such requests. SONI considers that additional clarity on how these powers will operate in practice would be beneficial, including how they interact with existing information gathering provisions under licence conditions.

2. Resourcing and cost recovery (Clauses 1(1) and 1(2))

SONI remains of the view that the Bill should provide greater certainty regarding the resourcing implications of the proposed arrangements. In February 2025, SONI published its Strategy 2025-2031: *Meeting Northern Ireland's energy needs, today and in the future*. This

sets out our enhanced strategic ambition, including to be a data driven trusted advisory to government, regulators and industry. This strategic role is one we are committed to, and it can support the intention of this Bill, however there are resource implications that need to be addressed. As a regulated entity with revenues determined through the price control process, SONI's ability to support additional information or analysis requests is contingent on appropriate funding arrangements.

3. Cross-departmental application of advisory functions

Given the cross-cutting nature of decarbonisation, SONI considers that there is merit in enabling the provision of advice, information and assistance to other relevant departments, or in clarifying how such coordination will occur in practice.

4. Alignment of regulatory framework with net zero objectives

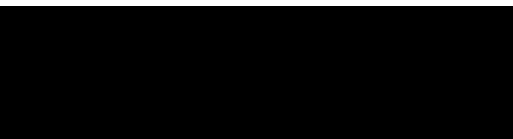
SONI has previously identified that the current legislative framework governing the UR's duties and objectives may constrain the pace and efficiency of delivery of a net zero electricity system. SONI considers that clarity on the broader legislative and regulatory trajectory in this area would support more effective long-term planning.

As drafted, the bill provides for UR support for policy developments, without considering the UR's ability to deliver or facilitate implementation of those policies once they have been developed. While this should not be a barrier to the timely implementation of this legislation, early action is required to ensure that the UR's vires does not become a bottleneck that restricts decarbonisation in Northern Ireland.

5. Conclusion

SONI supports the intent of the Bill and recognises the importance of strengthening the institutional framework underpinning Northern Ireland's energy transition. However, further clarification in relation to the scope and operation of the proposed powers, the role of regulated entities, the treatment of costs and resourcing implications, and the coordination of advisory functions across government would enhance the effectiveness of the legislation and provide greater certainty for regulated entities supporting its delivery.

Yours sincerely,

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SONI Ltd