

Daniel Caines

Senior Communications Specialist

Soni

08 December 2020

Dear Mr Caines

You have asked for a response to your draft TDPNI 2020 and I wish to make the following comments to matters in the order they arise in your document and I look forward to receiving a response:

***Executive summary***

You state:

*We ensure that electricity is always available when and where it’s needed, every second of every day and for decades to come. We do this in the most cost effective way possible and in the interests of all electricity users across Northern Ireland. We do so to meet the needs of all consumers, rather than pursue our own commercial interests.*

Just because you make a statement, such as the above, does not make it true.

I have raised concerns before about the independence of SONI, the fact that SONI is owned by EirGRID and that EirGRID is owned by ROI who has their own separate economic model that supports the big technology industries with their required data centres and expanding electricity demand to the level of 1/3 of all of Ireland’s electricity demand by 2027. By contrast Northern Ireland’s electricity demand for the foreseeable future remains fairly stable.

You go on to state:

*SONI is an independent entity, with no vested interest in the generation or selling of electricity. We don’t own the grid infrastructure and have no self interest in adding to it. We work every day with Northern Ireland Electricity Networks who build, own and maintain the grid transmission assets.*

Firstly NIEN is also owned by the ROI and therefore I have to question again your statement presented as if it is fact. All decisions regarding Grid development and its infrastructure are shaped by the economic needs of the ROI and their growth model for electricity demands in the ROI.

***2 STRATEGY FOR DEVELOPING THE GRID***

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You state:

*‘Inclusive consultation with local communities and landowners will inform how we plan the development the network*’.

In particular I am interested in the Creagh/Kells-Rasharkin New 110 kV Circuit New Build - £23.6M +£1.8M, 2026.

It appears at first glance that you are still undecided about which route the new 110kV line will take. However, in the Renewable Grid Liaison Group Minutes of meeting 03-12-19, Item 8, SONI reports that :

​*Kells/Rasharkin environmental report complete, SONI in process of submitting TMNP*

In the minutes of the RGLG meeting 03-03-2020 these proposals have been progressed. SONI states:

*Kells/Rasharkin proposals currently in process. To be submitted to the UR once complete, followed by consultation.*

I see no reference to a Creagh/Rasharkin environmental report or proposals option in these RGLG minutes. Yet you continue to refer to the Creagh/Rasharkin line option in your Draft TDPNI 2020 launched in November 2020.

To clear this up, can you forward me a copy of both environmental reports and drawings: the Kells/Rasharkin environmentalReport and drawings; and the Creagh/Rasharkin environmentalReport and drawings.

This new 110kV line is at a cost of around £25million will have a significant impact on many of my constituents who live and work in its path. Your TDPNI has no maps or visuals so I can see the actual route planned for this line, where ittouches down on land ownership and any sensitive areas where underground cabling is required.

With an increased concern in the locality of the impact infrastructure is already having on health, what consideration have you given to offset distances from residents’ homes, schools and care homes etc.

What community consultation have you carried out to date?

***7.2 Assett replacement projects – unchanged from 2019***

You state:

*Kells Inter-Bus Transformer Replacement One of the 275/110 kV 240 MVA interbus transformers at Kells is to be replaced due to the age and condition of the existing transformers.****In the meantime noise enclosures will be installed on both transformers.****Completion date: By 2025.*

I am pleased to see that you have made a little progress on the noise mitigation at the Kells Substation however no date is given for this. It is disappointing that it has taken this long andthat what would seem to be necessary, which is the replacement of both transformers, is only going to be the replacement of one transformer in 2025. What about the other transformer?

In this context, given the strain on the electricity system caused by an increase of renewable power going through the transformers at the Kells Substation, can you advise which other Substations or infrastructure are similarly showing signs of stress that you should be factoring into your plan now so that these do not become future sources of community distress?

***7.4 The South East Planning Area:***

You state:

*There is strong 275 kV infrastructure in this area, with significant spare capacity for generation and demand. In contrast to the North and West area, demand is greater than generation in the South-East.*

The statement you make and the diagram you present as illustration appear to be at odds.

The diagram illustrates that in the South East Planning Area generation is higher than demand. Contradicting this, your statement claims the exact opposite. Please provide an explanation.

**Your introduction to ‘The Project’ states:**

*For all of these reasons we are proposing a number of essential upgrades to the Northern Ireland grid including:*

• *We are also looking to mid-to-north County Antrim, here the grid is at capacity and we need to strengthen it to increase the flow of electricity from renewable sources*

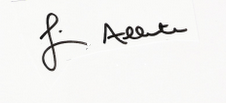
Despite local representations you seem to have determined that my area should bear even more of your infrastructure. There is hardly a hillside which is not covered in wind turbines and pylons. I note your statement does not refer to existing renewables sources, simply *renewable sources*. In other words, the new 180MW Cluster Station at Kells is designed for the purpose of attracting new renewables into the area.

The new 110kV line from Kells to Rasharkin together with the new 180MW cluster station, the 50MW+ BESS (in which you have a compound) is all to support mass deployment of renewables in the Kells area and there has been no *Inclusive consultation with local communities and landowners [to]inform how [you] plan the development the network.*

I reiterate, just because you make a statement, does not make it true.

Thank you for giving me the opportunity to comment on your draft TDPNI and I look forward to your response.

Yours sincerely



Jim Allister MLA