# **Evaluative Performance Framework**

Performance Report 2024-25

**SONI Self-Assessment** 



2 | Forward Work Plan 2025-2026

# **SONI Self-Assessment**

We are assessed by the Independent Panel using the UR's Evaluative Performance Framework Guidance document (see Chapter 4, pages 17-23 of the UR's Evaluative Performance Framework Guidance).

The Performance Report will be assessed on the following:

# **ASSESSMENT**CRITERIA

### **01** DELIVERY

The extent to which SONI deliver against:
(a) the specified deliverables and/or performance commitments from its
Forward Work Plan, and (b) the specified price control outputs (or deliverables) set by the Utility Regulator for new initiatives, and the justification for this delivery.

### STAKEHOLDER SATISFACTION

The extent to which stakeholders are satisfied with performance of SONI, taking its performance in 2019/20, as supplemented by its Forward Plan, as it's Baseline.

### 03 ADAPTABLITY

The extent to which SONI has shown successful adaption.

In this document, we have highlighted our views against how the plan meets the assessment criteria and what changes have been made since the previous assessment.

We have provided our self-assessment of our performance for the Performance Report 2024-2025 in the table below.

### **SONI Self-Assessment Grading**

|                             | Role 1 - System<br>Operations &<br>Adequacy | Role 2-<br>Independent<br>Expert | Role 3 - System<br>Planning | Role 4 -<br>Commercial<br>Interface |
|-----------------------------|---|----------------------------------|-----------------------------|-------------------------------------|
| Weights                     | 27.5  | 25                               | 25                          | 22.5                                |
| Criteria                    |   |                                  |                             |                                     |
| 1. Deliverablity            | 1   | 1                                | 0                           | 0                                   |
| 2. Stakeholder Satisfaction | 0   | 1                                | 0                           | 0                                   |
| 3. Adaptability             | 1   | 1                                | 1                           | 0                                   |
| Assessment Total            | 2   | 3                                | 1                           | 0                                   |
| Assessment Grade            | 4   | 5                                | 4                           | 3                                   |
| Overall Grade               | 4.025                                       |                                  |                             |                                     |



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## **SONI Self-Assessment**

### Role 1 System Operations and Adequacy

### **Assessment Criteria SONI Actions Deliverablity** Role 1 is centred on our core statutory responsibility to maintain real-time system operation and ensure system adequacy under all conditions. This year placed unprecedented pressure on those responsibilities, combining extreme operational challenges with the delivery of major modernisation programmes. Against this backdrop, we believe that we have exceeded expectations for delivery, demonstrating disciplined governance, strong technical capability, and effective crisis response, while also progressing the majority of our Forward Work Plan commitments for Role 1. We committed to 15 milestones under Role 1: 9 Delivered 3 Partially Completed – Outside of SONI's Control 3 Not Progressed – Outside of SONI's Control Despite these variances, we delivered the majority of milestones across four major transformation programmes and maintained momentum through proactive governance and stakeholder engagement. December 2024 represented one of the most challenging periods in our operational history with it also having a knock-on effect for the rest of the year. Storm Darragh caused extensive damage at Ballylumford, removing a major fossil-fuel unit from service, while technical issues at Coolkeeragh further tightened the generation margin as it became unavailable. To maintain security of supply, we required the additional running of Kilroot, pushing the plant close to its NIEA environmental hour limits. Working around the clock with DfE, the UR and the NI Executive, we secured a temporary licence adjustment, preventing any interruption to electricity supply. Alongside managing the immediate crisis, we acted swiftly to explore solutions to sustain system resilience. We mobilised a technical team to carry out urgent system studies assessing whether the system could safely operate with only two conventional units online, something never before achieved. Once confident that stability and inertia requirements could be maintained, we implemented secure two-unit operation in December 2024, marking a major operational milestone for Northern Ireland. This breakthrough directly enabled the launch of a formal two-unit trial in August 2025 to assess feasibility of moving to this operating mode routinely, unlocking long-term decarbonisation and cost benefits. While we responded to severe system challenges, we also delivered a major upgrade to the Energy Management System (EMS) used by our control room.

| Assessment Criteria         | SONI Actions   |
|-----------------------------|--|
|                             | This new EMS introduced enhanced hardware, middleware and software, delivering:  |
|                             | Improving real-time performance  |
|                             | Greater system resilience and  |
|                             | Strengthened cyber and operational security  |
|                             | Implementing such a complex technical transition during a period of system stress demonstrates the strength of our operational management, planning and internal capability.   |
|                             | Even under these extraordinary conditions, we:   |
|                             | <ul> <li>Delivered the majority Role 1 milestones across the three large transformation<br/>programmes</li> </ul>  |
|                             | Completed critical technical studies and system studies  |
|                             | Maintained programme governance and collaboration with EirGrid, vendors and market participants  |
|                             | <ul> <li>Provided strong justification and revised delivery plans for milestones<br/>delayed due to external factors.</li> </ul>   |
|                             | The ability to sustain progress on modernising scheduling, dispatch, system service and operational policy, while simultaneously managing one of the most significant real-time system challenges in recent year, demonstrates the strength of our operational performance and internal processes.   |
|                             | Considering the scale of external challenges, the demands placed on real-time operations and the centrality of system adequacy to Role 1, we consider that we have exceeded expectations for delivery. We delivered the planned programme of work where possible, provided sound explanations for any deviations, and manged both operational crises and programme risk responsibly and transparently.   |
| Stakeholder<br>satisfaction | Stakeholder confidence in our system operation and market delivery functions strengthened over the year, driven by our transparent communication, proactive engagement and credible technical leadership across all major Role 1 programmes. While feedback was not without challenge, the overall sentiment from regulatory authorities, market participants, developers and broader industry groups has been constructive, positive and strongly support of our approach.          |
|                             | Our stakeholders have consistently recognised the scale of the operation challenges faced this year and expressed confidence in our handling of them. The urgent system studies and successful introduction of secure two-unit operation were widely regard as decisive and professionally executed actions that protected consumers and maintained system stability. Feedback highlighted our openness, responsiveness, and willingness to provide detailed technical explanations. |



| Assessment Criteria | SONI Actions   |
|---------------------|--|
|                     | Across the SDP, FASS and 80% SNSP work, we maintained a structured, regular and accessible engagement model.   |
|                     | This included:   |
|                     | Monthly Future Power Market workshops  |
|                     | Clear and frequent programme updates   |
|                     | Detailed technical material and plain-English summaries  |
|                     | Bilaterial readiness assessment with all affected participants   |
|                     | Active support during PIT testing and cutover preparation  |
|                     | Open Q&A sessions on complex operational and market design issues  |
|                     | Participants have acknowledged the value of this engagement model, particularly the increased availability of our teams during key delivery phases and the clarity of documentation and explanations provided.   |
|                     | The RAs continue to receive regular monthly and ad hoc updates, we provided unprecedented visibility on programme risks, mitigation measures, and revised schedules. This transparent approach ensured that regulatory confidence was maintained even when complex dependencies created unavoidable delays.  |
|                     | Developers and renewable industry groups have responded positively to our openness, particularly around SNSP advancement, and operational policy development. Stakeholders have noted that our willingness to shared detailed analysis, explain constraints honestly and engage with difficult questions has strengthened trust and improved understanding of our role and responsibilities.   |
|                     | Overall, stakeholder sentiment across Role 1 has been positive, reflecting trust in our professionalism, transparency, and technical competence during a highly challenging operational year. While some areas generated debate, stakeholders remain confident in our direction, delivery approach and our commitment to collaboration. Together, we consider this demonstrates how we have met expectations for stakeholder satisfaction for Role 1.  |
| Adaptability        | This year we had to demonstrate significant adaptability across system operations and market development, responding quickly and effectively to events that were not anticipated in the Forward Work Plan. While these responses were strong and credible, the scale of unforeseen challenges meant efforts were focused on maintaining system integrity and progressing revised delivery plans. For this reason, we consider that performance aligns with exceeding expectations.  Our operational resilience was tested to an extent rarely experienced in our |
|                     | history. As explained Storm Darragh caused extensive damage at Ballylumford, followed by technical problems at Coolkeeragh resulting in a rapid deterioration of system adequacy. We had to act immediately to maintain security of supply while two major plants were unavailable.  |

| Assessment Criteria | SONI Actions   |
|---------------------|--|
|                     | We demonstrated agility by:  |
|                     | <ul> <li>Working extensively with DfE, UR and the NI Executive to secure a temporary<br/>uplift of Kilroot's run-hour limits.</li> </ul>   |
|                     | Mobilising engineering and operations teams  |
|                     | Safeguarding system stability under extreme conditions   |
|                     | This was a clear demonstration of our ability to adapt at speed in a high-risk environment.  |
|                     | In December, we initiated and executed urgent system studies to determine whether the system could operate securely with only two conventional units online. These studies were completed at pace and to a high technical standard. Once system security was proven, we implemented two-unit operation for the first time in Northern Ireland's history. |
|                     | By being adaptable we have:  |
|                     | Reduced reliance on fossil fuel generation during constraints  |
|                     | Enabled a formal system-wide two-unit trial beginning in August 2025   |
|                     | <ul> <li>Created a pathway for long-term reduction in operational costs and dispatch<br/>down</li> </ul>   |
|                     | This was a major strategic achievement delivered under exceptional operational pressure.   |
|                     | Across the SDP, FASS and 80% SNSP programme we demonstrated flexibility by:  |
|                     | Strengthening governance and cross-TSO collaboration   |
|                     | Adjusting deliverables following system studies and design refinements   |
|                     | <ul> <li>Accelerating actions where new information emerged. For examples,<br/>implementing a revised SNSP methodology earlier than expected</li> </ul>  |
|                     | With these adaptations we ensured that progress could continue despite challenges outside our control.   |
|                     | Alongside our operational pressures, we successfully introduced our upgraded EMS into the control room. This required:   |
|                     | Coordinated cutover planning,  |
|                     | Additional controller training   |
|                     | Real-time readiness checks and system validation   |
|                     |  |



# Role 2 Independent Expert

| 0<br>0<br>m                 | For Role 2 delivery, we consider that we have <b>exceeded expectations</b> , with 88% of milestones completed and the remaining delays arising entirely from factors outside SONI's control. Across all projects, we delivered high-quality outputs, maintained schedule discipline, and demonstrated strong governance in progressing complex evidence-based work programme.  |
|-----------------------------|--|
| ir<br>e<br>c<br>F<br>N<br>c | The Public Engagement & Community Framework project delivered all milestones in full, embedding new model and processes that now set the standard for early, transparent and structured engagement across Northern Ireland. The completion of the six-week public consultation, the piloting of Community Forum, and the full refresh of the Landowner Charter and Compensation Model reflect a level of delivery that went beyond statutory requirements and created tangible improvements to the way grid development is understood and experienced by the public. |
| d<br>a                      | The SRP27 Stakeholder Engagement Programme also achieved strong delivery, completing Phase 1 and initiating Phase 2. We ensured continuity by adapting engagement formats, keeping all sessions inclusive, and maintaining momentum in business plan development.  |
| jo<br>e<br>c                | The Future Energy Modelling Group (FEMG) delivered all outputs within the ointly agreed revised timeline, including the full modelling paper and an expanded Executive Summary. Our work was central to establishing a new cross-organisation governance structure and producing analysis that is already being used to inform cross-government decision-making.   |
| M<br>a<br>d                 | Finally, the Dispatch Down Action Plan, and the TSO-DSO Future Operating Model both delivered their milestones in full, producing high-quality technical analysis, credible system recommendations, and collaborative outputs that deepen our coordination with DfE, UR, NIE Networks and industry developers and the wider sector.  |
| d<br>e<br>d<br>d            | Across Role 2, our performance shows consistent, proactive, high-quality delivery that has advanced system understanding, strengthened strategic evidence bases and improved the wider decision-making landscape. Where delays occurred, they were due to regulatory, policy or cross-jurisdiction dependencies and were managed transparently and effectively, without reducing project outcomes.   |
| satisfaction s<br>ir<br>a   | Within Role 2, we consider that our stakeholder satisfaction is exceptionally strong, with consistently positive feedback received from community groups, industry participants, government departments, the UR and expert stakeholders across all programmes. We consider that Role 2 is widely viewed as an area where we demonstrate leadership, transparency, and collaboration, reinforcing our goal to be an independent expert within industry.   |

| Assessment Criteria | SONI Actions  |
|---------------------|---|
|                     | Our new Public Engagement Model, Community Forum Framework, Citizen Sounding Boards and refreshed Landowner Charter were all designed through extensive co-design, and feedback highlighted our openness. Our partnership with Young Farmers' Club Ulster in particular was praised for creating a trusted, independent channel for landowners, something stakeholders have described as a meaningful improvement in how major infrastructure projects are handled.   |
|                     | Our SRP27 engagement process has also been recognised as a model of best practice. Stakeholders have commended the early, structured and inclusive approach, the breadth of engagement techniques and the establishment of the Stakeholder Advisory Challenge Group (SACG). The feedback that we have received from SACG members specifically has highlighted the effectiveness of the forum, noting our transparency, willingness to be challenged and incorporation of stakeholder views into priorities and themes.  |
|                     | The Future Energy Modelling Group received highly positive feedback from DfE, UR and other participants, who have emphasised our leadership in establishing a transparent, collaborative evidence base. The Steering Groups request to explore expanding Phase 2 reflects confidence in the process and our technical credibility.  |
|                     | Feedback on our work on Dispatch Down has been especially strong with RenewableNI, DfE and industry participants emphasising the clarity, depth and transparency of our analysis. Stakeholders described the engagement approach as "no stone unturned" and noted that our methodologies are now drawing interest from GB bodies, including DESNZ, on approaches to constraint management.  |
|                     | Across all Role 2 activity, we have consistently delivered high-quality engagement, strong transparency, meaningful co-design and responsiveness to stakeholder needs. We consider this highlights that we have <b>exceeded expectations</b> for stakeholder satisfaction in Role 2.  |
| Adaptability        | For the adaptability criterion in Role 2, we consider we have demonstrated a high level of adaptability, consistently going beyond our plan to respond to emerging policy development and stakeholder needs. This adaptability delivered additional benefits that extended well beyond the commitments set out in the original Forward Work Plan. Across all major projects, we adjusted timelines, engagement structures and analysis to meet changing expectations, ensuring that we did not compromise quality or momentum. For example, the Public Engagement and Community Framework was adapted to align with the new Planning (Miscellaneous Amendments) Regulations (NI) 2025, ensuring that our approach met updated statutory requirements. |
|                     | In the SRP27 engagement programme, we revised the timelines following the extension of our existing price control and flexibly rescheduled or redesigned sessions at stakeholder's request. This ensured inclusivity and preserved the depth and quality of input. Our creation of the SACG, reflects a proactive and innovative approach to transparent governance and independent challenge.  |



| Assessment Criteria | SONI Actions   |
|---------------------|--|
|                     | The FEMG project required substantial adaption due to format changes requested by the Steering Group, evolving data needs and constraints on modelling file sharing. We demonstrated agility by redesigning the outputs, developing new challenges for transparency and maintaining alignment across all three organisations, ensuring delivery remained on track. |
|                     | Adaptability was also clear in our Dispatch Down Action Plan, where we expanded our analysis and engagement to include new technology providers, non-traditional flexibility solutions and external experts, despite not having a dedicated innovation function at present.  |
|                     | Across Role 2, we responded proactively to new information, shifting requirements and stakeholder expectations. We consistently delivered more than was originally planned, introduced new forums and governance structures, and enhanced the quality of outputs through adaptive, responsive programme management   |
|                     | We therefore consider that our performance on adaptability for Role 2 clearly exceeds expectations.  |

# Role 3 System Planning

| Assessment Criteria | SONI Actions   |
|---------------------|--|
| Delivery            | For Role 3 we believe that we have <b>met expectations</b> , reflecting our strong performance. System planning is inherently complex and highly dependent on factors outside of our control, yet we delivered 9 of 11 milestones <b>(82%)</b> and made strong progress on the remaining two, both of which have not been completed due to external dependencies. The scope and scale of this year's work required deep technical analysis, cross-utility coordination, policy development, and long-term infrastructure planning, all of which were delivered to a high standard. |
|                     | The successful publication of our proposed Transmission Cluster Policy consultation was a major achievement, representing a strategic reform requiring close alignment with NIE Networks, the UR and Renewables NI. Its delivery within our revised timelines, and the quality of the final output, exceed initial expectations.   |
|                     | Similarly, the system-wide assessment of transmission nodes delivered an improved joint SONI-NIE Networks methodology that is now embedded across all connection assessment, an enhancement beyond the original intent of the project.   |
|                     | Infrastructure projects also progressed strongly. The Energising Belfast programme delivered one milestone and progressed the second as far as possible; delays in securing city-centre land options were due solely to complex legal negotiations and market conditions. For Airport Road Main, both milestones were successfully delivered within the year despite early-year legal and design dependencies. The North-South Interconnector met all of its milestones and transitions into the construction phase through strong coordination between SONI and NIE Networks.     |
|                     | The Joint Project Management Office with NIE Networks, delivered significant improvements to programme governance, risk management and transparency, including publication of revised Estimated Completion Dates, an output that exceeds expectations for system planning delivery.  |
|                     | While the FAQ Methodology Review consultation milestone has moved into the 2025/26 Forward Work Plan to ensure alignment with UR timelines, we advanced the technical programme substantially, completing the core model redevelopment and methodological design necessary for consultation.   |
|                     | Across the role, we delivered a high proportion of milestones, maintained momentum where external constraints arose, and produced outputs that strengthened long-term system planning. With the quality of delivery, the breadth of progress, and the proactive management of dependencies we consider that this has demonstrated that we have <b>met expectations</b> in delivery in Role 3.  |



| Assessment Criteria         | SONI Actions   |
|-----------------------------|--|
| Stakeholder<br>satisfaction | Stakeholder Satisfaction across Role 3 has been consistently positive, reflecting a year where we demonstrated strong transparency, open communication and collaborative working on major planning and policy initiatives. System planning involves a broad spectrum of stakeholders, NIE Networks, Renewables NI, DfE, UR, local authorities, Statutory bodies, landowners and community groups, and feedback confirms that we <b>met expectations</b> by engaging constructively and incorporating stakeholder view throughout the design and development of our work. |
|                             | Role 3 has a number of strategic policy projects, such as the Transmission Cluster Policy, and the Transmission Nodes review. Stakeholders acknowledged our willingness to collaborate early, share analytical evidence and respond to feedback. This created a strong foundation of trust, particularly in areas where policy decisions have significant implications for investment and system development.  |
|                             | For infrastructure projects, we maintained regular and structured engagement with landowners, planning authorities, Belfast City Council, Belfast Harbour Commissioners, and local business groups. Stakeholders have consistently welcomed the level of transparency provided, particularly in Energising Belfast and Airport Road, where we communicated constraints clearly while working proactively to keep projects moving.  |
|                             | The JPMO has further strengthened stakeholder confidence by improving visibility our grid delivery timelines and deepening coordination with NIE Networks. Regulatory and government stakeholders noted the value of the enhanced joint model and its contribution to system planning transparency.  |
|                             | Across the year, engagement was inclusive, evidence-based and well-received. While the role did not deliver beyond expectations, stakeholders consistently indicated confidence in our approach, demonstrating that Role 3 <b>meets expectations</b> for stakeholder satisfaction.   |
| Adaptability                | Within Role 3 we had to respond to several external pressures, regulatory dependencies and market-driven challenges. We met expectations by showing agility in adjusting timelines, refining methodologies and strengthening governance processes without compromising delivery quality.   |
|                             | Where external factors constrained progress, such as legal complexities affecting Energising Belfast land negotiations, or the need for regulatory alignment on the FAQ methodology, we adapted our internal processes, maintained momentum on workstreams, and ensured that technical development continue so future milestones could progress without delay once dependences were resolved.  |
|                             | The Transmission Cluster Policy demonstrated adaptability though ongoing development with NIE Networks and the UR, incorporating lessons from the distribution-level cluster process and integrating stakeholder feedback into a more robust final consultation.   |
|                             |  |

| Assessment Criteria | SONI Actions   |
|---------------------|--|
|                     | The new system-wide joint methodology for evaluating transmission node capacity stemmed from an early recognition that the project required a broader scope than originally planned. We adapted by expanding the analytical approach to deliver a more scalable and future-proof process.  |
|                     | Through the JPMO, we adjusted governance arrangements to accommodate increased connection activity, external design changes, and revised delivery assumptions across the grid programme. This ensured that the infrastructure plan remained credible despite shifting external conditions. |
|                     | Across all projects in Role 3, we demonstrated flexibility and responsiveness and therefore we consider we have <b>exceeded expectation</b> s for adaptability in Role 3.  |

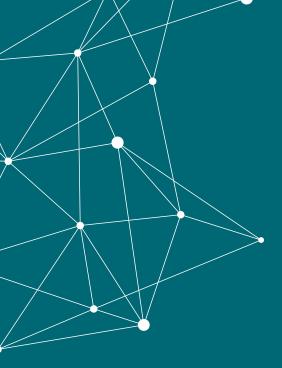


# Role 4 Commercial Interface

| Assessment Criteria         | SONI Actions   |
|-----------------------------|--|
| Deliverablity               | For Role 4 we consider that we have <b>met expectations</b> for delivery. During the performance year, we successfully delivered the core milestone within our control: the public consultation on LCIS Phase 2. This consultation was delivered to a high standard, following completion of detailed system studies, procurement design work and legal review. The consultation was a critical step in shaping the eventual market design and ensuring broad stakeholder participation. |
|                             | The subsequent Recommendation's Paper, while completed shortly after year-<br>end, October 2025, falls outside the scope of this reporting period and cannot<br>be counted as an in-year delivery milestone. However, its completion shortly<br>after year-end demonstrates our continued progress and ensures that the<br>programme is now fully prepared for the next stage, pending SEMC approval.  |
|                             | Other milestones scheduled for this period, specifically the SEMC decision and preparatory procurement activities, could not progress due to their dependence on SEMC committee timelines, which are fully Outside SONI's Control. Despite these dependencies, we ensured all prerequisite analysis, documentation and governance steps were completed so that the programme is ready to proceed promptly once regulatory approval is given.   |
|                             | Overall, we delivered the elements for which we were responsible during the year and maintained programme momentum, representing delivery that meets expectations  |
| Stakeholder<br>satisfaction | The work within Role 4 for Stakeholder satisfaction we consider <b>meets expectations</b> . We carried out an extensive and well-structured public consultation process, received fourteen detailed responses and hosted a webinar with over seventy attendees. Stakeholders have consistently noted the clarity of the materials, the thoroughness of the technical analysis, and the opportunities provided for meaningful dialogue.   |
|                             | We also maintained regular engagement with the Utility Regulator through the established Shaping Our Electricity Future (SOEF) Operations governance process. Throughout the period, stakeholders reported that our communication was clear, responsive and transparent, particularly regarding programme sequencing and regulatory dependencies.  |
|                             | Although later milestones could not be completed due to SEMC timelines, it was acknowledged that these dependencies were outside of our control. Stakeholders valued our constructive engagement, open communication and proactive sharing of information throughout the year.   |
|                             | We consider that this consistent, positive feedback indicates that stakeholder satisfaction <b>meets expectations.</b>   |
|                             |  |
|                             |  |

| Assessment Criteria | SONI Actions   |
|---------------------|--|
| Adaptability        | The work in Role 4 is highly technical. We have actively adjusted programme timelines and internal sequencing to account for the complexity of system studies, the need for comprehensive legal review and the importance of ensuring procurement arrangements are robust before seeking SEMC approval. These proactive refinements ensured that the public consultation was delivered on a strengthened analytical and policy foundation. |
|                     | As the year progressed, we adapted the programme to include a market competition assessment, ensuring that any future procurement process will attract sufficient participants and deliver value for consumers. We also aligned internal work planning, with SEMC decision timelines, refining documentation and maintaining readiness despite external dependencies.  |
|                     | These adaptations strengthened the quality of the programme and ensured that we continued momentum, while also remaining consistent with what would reasonably be expected for a project of this scale and regulatory importance. Therefore, we consider we have <b>met expectations</b> for this criterion.   |







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