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# Draft Transmission Development Plan Northern Ireland 2025-2034

Public consultation report

March 2026

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## Contents

1	Introduction .....	3
1.1	Context .....	3
1.2	Putting communities at the heart of the energy transition .....	5
2	Purpose of the transmission development plan .....	6
3	The consultation process .....	7
3.1	Responses to the consultation .....	7
4	Summary of feedback within the statutory scope of the consultation .....	8
4.1	Strategic Projects, Delivery and Sufficiency .....	8
4.2	Grid delivery / Estimated Completion Dates .....	11
4.3	Asset refurbishment and maintenance .....	14
4.4	Connecting Future Renewable Generation .....	16
5	Summary of feedback not within the scope of the consultation .....	18
5.1	Establishing the Joint Programme Management Office .....	18
5.2	Dispatch down .....	21
5.3	Firm Access Arrangements and flexibility measures .....	23
5.4	Probabilistic Assessment .....	25
5.5	Interconnection .....	26
5.6	Consumer costs and savings .....	27
5.7	Public engagement .....	29
6	Summary of changes to the draft TDPNI following the consultation .....	31
	Appendix A .....	32

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# 1 Introduction

SONI is the electricity Transmission System Operator (TSO) for Northern Ireland. Our role is to operate the transmission system every minute of every day to ensure electricity can flow from where it is generated to where it is needed at the lowest price possible for the Northern Ireland consumer. The transmission grid safely brings power from generators and sends it to NIE Networks' distribution system. They then supply electricity to every home, farm, community and business in Northern Ireland.

In addition to maintaining a safe, secure and reliable supply of electricity in real time, SONI also has the crucial responsibility of planning and helping to deliver a transformation of the power system to enable a cleaner, affordable, more secure energy future for everyone in Northern Ireland. This includes interconnection to neighbouring grids and running the wholesale electricity market.

In this respect, SONI has a critical enabling role when it comes to delivery of Northern Ireland's Energy Strategy and ambitious climate change targets.

The transmission grid and its infrastructure need to be made stronger and more flexible to transport the increases in clean energy generation which we expect to see over the next number of years. It also needs to be secure so that consumers have the high quality and reliable electricity supply they have come to expect.

This infrastructure upgrade is the most significant in its complexity, scale and impact since rural electrification and is a critical step on the collective journey to net-zero carbon emissions by 2050.

The investment and projects outlined in our draft Transmission Development Plan Northern Ireland (TDPNI) 2025-2034 will ensure the transmission grid is fit for the future, providing for Northern Ireland's environmental, societal and economic aspirations.

This document includes the views and feedback received from the energy industry and other key stakeholders during the consultation process and our responses to them.

## 1.1 Context

Electricity systems across the world are changing. At SONI, we plan the transmission system for the benefit of future generations. The Northern Ireland Energy Strategy 'Path to Net Zero Energy' and Climate Change Act (Northern Ireland) 2022 have set ambitious and challenging targets and SONI has a critical role in helping to ensure these are delivered. SONI is committed to delivering the transformation required to make the electricity grid stronger and more flexible to transport the increases in clean energy generation which we expect to see over the next decade and beyond.

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SONI has a licence as TSO which governs what we do and how we do it<sup>1</sup>. We are regulated by the Utility Regulator (UR), and every single network development project is subject to a funding decision by the UR before it can proceed. This process requires us to clearly demonstrate the need for any network development, in response to forecast changes in demand and planned changes in generation, as well as the condition and suitability of existing infrastructure.

SONI does not own any electrical infrastructure – the transmission system is owned by NIE Networks, who are responsible for constructing the network development projects identified by SONI. Project timelines are determined by our 3-Part Grid Development Process including design work with NIE Networks, planning consents and land rights, followed by NIE Networks construction phase including procurement of equipment, and the necessary pre-construction and construction regulatory approvals.

In 2024, SONI and NIE Networks established a dedicated Joint Programme Management Office (JPMO) to oversee, co-ordinate and where possible accelerate this transmission investment programme. The focus of the JPMO is on integrated planning, deeper collaboration, accountability and more regular reporting, to provide more robust timelines for individual project delivery and the overall development plan.

The electricity system is complex and has a wide-ranging stakeholder landscape. While there is a strong consensus on the importance of decarbonising our society and economy, it is important to recognise there are different, overlapping and sometimes competing priorities as is demonstrated in the responses to this consultation. As the TSO, SONI has to work with our stakeholders to find balanced solutions to the opportunities and challenges presented by the energy transition.

In this respect, it is vitally important that we acknowledge that our transmission system is funded from all island generators and NI consumers through NIE Networks' Regulated Asset Base (RAB). As such, it is imperative that we deliver this transformation as quickly as possible while ensuring consumers have high quality and reliable electricity supply at the least possible cost.

Whether it's local communities, businesses, landowners, civic society organisations or our partners in the energy industry, we understand that our stakeholders must be at the heart of our plans. Our plans are impacted by multiple external factors, and we know we cannot deliver them alone. We are grateful for those consultees who responded to our draft TDPNI 2025-2034.

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<sup>1</sup> <https://www.uregni.gov.uk/files/uregni/media-files/SONI%20TSO%20Consolidated%20Feb%202019.pdf>

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## 1.2 Putting communities at the heart of the energy transition

Before we develop or add to the grid, we work with those who may be affected by our plans. Grid development is a consultative process, and we aim to work alongside local communities, landowners and businesses to deliver this.

SONI have a 3-Part Process for Grid Development which puts public engagement and consultation at the heart of how we upgrade and improve the transmission grid. On each project, we engage with the community, elected representatives and other stakeholders with a goal of finding the best possible solution, and key to this is understanding local concerns and working to enhance public acceptance of increased transmission infrastructure.

Our 3-Part Process means we often engage with local communities years before a planning application is submitted, offering multiple opportunities to help shape our plans. Meaningful engagement with local communities is at the core of our approach and while our existing model strikes a balance between what is required by statutory planning requirements for Pre-application Community Consultation and meeting the expectations of the communities, we are committed to striving for continual improvement. That is why we engaged and consulted on an enhanced Public Engagement Model which was published in 2024 and a new, more deliberative based Community Forum Framework which we published in December 2025.

In order to provide a balanced solution, we aim to ensure that our approach minimises costs to the consumer while also contributing to Northern Ireland's clean energy targets and supporting security of supply. By working with these principles at our core, we can transform the power system to deliver for consumers and our economy, while keeping Northern Ireland's switch to clean energy on track.

Before the TDPNI can be approved, SONI is required to consult on a draft TDPNI in order to capture the inputs from stakeholders.<sup>2</sup> Based on the responses to the consultation we then update the draft TDPNI where necessary and submit a consultation report alongside the updated TDPNI to the UR.

Following this, the UR is obligated to hold a further public consultation on the draft TDPNI.

This document is the report on SONI's consultation on the draft TDPNI 2025-2034. It describes the consultation process and provides an overview of the submissions received and our responses to the issues raised.

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<sup>2</sup> EU Directive 2019/944 (Article 51)

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## 2 Purpose of the transmission development plan

Local and UK strategic energy policy objectives set the context for investment in the Northern Ireland transmission system to ensure security of electricity supply, competitiveness of the economy, and long-term decarbonisation of electricity supply. To achieve these strategic objectives, it is necessary to invest in the development and maintenance of the electricity transmission system in line with the Transmission System Security and Planning Standards (TSSPS).

SONI has a duty to prepare and publish a TDPNI under Condition 40 of the SONI Licence, which transposes Article 51 of The Electricity Directive 2019/944. The primary objective of the TDPNI is to outline the required transmission network developments planned for the next ten years. In line with our licence obligation, the TDPNI explains:

- Our approach to network development;
- The drivers for investment, both policy drivers and technical drivers;
- The identified needs of the transmission network;
- Asset replacement requirements; and
- The planned network developments with estimated project completion dates aligned with the work of SONI and NIE Networks' JPMO.

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### 3 The consultation process

The draft TDPNI 2025-2034 was posted for public consultation on the SONI website and SONI's consultation portal on 17 October 2025 enabling stakeholders to access all relevant material and make a submission in the same place.

A notification of SONI's consultation was also sent, via email, to SONI stakeholders subscribed to the [info@soni.ltd.uk](mailto:info@soni.ltd.uk) mailing list. Notification of the consultation was also publicised on SONI's social media channels.

Throughout the consultation period, SONI social media channels posted several notifications in order to remind stakeholders of the submission timeline.

The consultation closed on 17 January 2026.

#### 3.1 Responses to the consultation

SONI received 9 responses to the TDPNI consultation. One response was confidential; the other 8 responses were from:

1. Mutual Energy Ltd
2. Consumer Council for Northern Ireland
3. Energia
4. EP UK Investments
5. Foyle Port
6. iPower
7. RenewableNI
8. RES Ltd

We would like to thank all parties for their responses. The rest of this report deals with the issues raised in these submissions. We have attached the responses with this report.

Where a submission was made via the consultation portal, it is publicly available at [consult.soni.ltd.uk](http://consult.soni.ltd.uk)<sup>3</sup>.

In the following sections, we summarise and respond to the submissions. It is important to highlight that the purpose and content of the TDPNI is defined in our licence and EU law. Many of the issues highlighted in the responses can, and are being addressed through other, more appropriate, frequent and flexible communication channels.

**Section 4** presents a summary of responses received which are within the statutory scope of this consultation. **Section 5** summarises other responses received which fall outside the statutory scope of this consultation.

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<sup>3</sup> [Draft Transmission Plan for Northern Ireland 2025-2034 | SONI Consultation Portal](#)

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## 4 Summary of feedback within the statutory scope of the consultation

Feedback is grouped and summarised by theme, where possible, with our response to each theme included. A number of acronyms are used by respondents, and a full list of these are explained in **Appendix A**.

### 4.1 Strategic Projects, Delivery and Sufficiency

#### **Energia**

*Energia urges SONI to prioritise the following projects which have experienced delivery delays:*

- *Mid-Antrim upgrade*
- *North West 110 kV Reinforcement*
- *Connect West (formerly Mid-Tyrone)*
- *North South interconnector*

*These projects are fundamental to unlocking renewable potential by alleviating network constraints and reducing dispatch down.*

#### **Foyle Port**

*Grid capacity and timely access to the transmission system at Coolkeeragh are critical for the delivery of the current projects and attracting and developing the new projects that are starting to arise. We therefore welcome the reinforcement and upgrade projects that have been set out in the TDP relating to the NW of Northern Ireland, and particularly those providing reinforcement to the Coolkeeragh transmission substation and related networks...*

*Foyle Port would ask that SONI continue to engage with relevant stakeholders and take action to manage the delivery of transmission projects at Coolkeeragh as expeditiously as possible, particularly taking into consideration wider economic and system benefits that will arise through the connection of new demand and low carbon technologies to the transmission system.*

#### **Mutual Energy Ltd.**

*We also note that the project is described as “allow[ing] the full import and export capacities of the Moyle Interconnector to be utilised”. Since this project was first proposed it has been our understanding that its completion would lead to the relevant operational constraints on Moyle being lifted. That being said, we would welcome clarity on whether this is entirely correct or if utilisation of the full import and export capacities is contingent on any other projects listed in the TDPNI.*

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## **RenewableNI**

*In SONI's previous TDP, six key enabler projects were identified as critical to achieving 80% renewable electricity by 2030.*

*However, the 2025-2034 draft TDP no longer re-affirms or updates this list. Instead, the language has shifted toward "key enablers for a plan-led approach," focusing on process rather than delivery. The removal of explicit "key to 80% by 2030" language, without any clear explanation, creates uncertainty about which specific reinforcements SONI considers essential to meeting statutory targets...*

*RNI therefore urges SONI to re-state or refresh the list of strategic network enablers within the final plan, providing clear delivery milestones and justifications for any schedule changes...*

*RNI notes that several reinforcements identified within SOEF Roadmap are not included in the draft TDP 2025-2034 document. The omission of several SOEF-listed projects therefore raises questions about alignment between SONI's strategic modelling and its delivery plan. In particular, the following reinforcements appear in SOEF Appendices 4 and 5 but are absent from the draft TDP:*

- *Two 110 kV OHL upgrades between Lisburn and Tandragee*
- *New 275 kV substation in South East Antrim*
- *Magherakeel-Omagh Dynamic Line Rating project*

*RNI requests that SONI clarify the status of these reinforcements and provide an explanation as to why they are not included within the draft TDP.*

## **RES**

*The currently estimated completion date for the Limavady Transformer Replacement project is significantly behind what is required operationally...*

*Given the urgent and growing connection pressures in the North and West planning area—as acknowledged in the Draft TDPNI—the present 2029 delivery timeline is too late to address the immediate constraint, and risks further inhibiting renewable integration and the achievement of national clean energy targets.*

*We therefore urge SONI and the JPMO to expedite this project's progression out of the early "Conceptual / System Planning" stage and to explore all feasible measures to accelerate delivery, given that the limitation is already materially impacting stakeholders today.*

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## Our Response

A number of respondents urge prioritisation of renewables projects and, in some cases, projects specific to their plans. With responsibilities to both plan and operate the transmission system, SONI must consider the needs of the transmission network as a whole, including ensuring security of supply. Working together with NIE Networks through the JPMO, we have set out how the full portfolio of transmission network reinforcements can be delivered over the course of the TDPNI period.

Projects that were highlighted as key enablers in the previous TDPNI are still being progressed, and we recognise their importance to delivering the 80% RES-E target. This has not changed. The work performed by the JPMO has resulted in changes to ECDs, however they continue to be progressed as quickly as possible while also taking into consideration the competing needs across the transmission network, and the dependencies we have on external stakeholders.

The inclusion of projects named in the plan is regularly under review, and in some cases a need may change which defers the start of the optioneering process for a solution. One respondent noted the absence of some projects from this draft TDPNI 2025-2034 that were listed as candidate reinforcements in *Shaping Our Electricity Future*. We will update the draft TDPNI 2025-2034 to clarify the status of the following projects:

- *Two 110 kV OHL upgrades between Lisburn and Tandragee*. These will now be investigated as part of the Lisburn Upgrade which is included in the draft TDPNI.
- *New 275 kV substation in South East Antrim*. This project is now the Kilroot Transmission Substation which is included in the draft TDPNI.
- *Magherakeel-Omagh Dynamic Line Rating (DLR) project*. This DLR scheme is not categorised as a network investment project and as such is being progressed as an innovation project by SONI and NIE Networks and is therefore not listed in the draft TDPNI.

A number of respondents urge SONI to deliver network reinforcements in the timelines set out in the draft TDPNI 2025-2034. It is important to note that delivery of new infrastructure does not solely lie with SONI; multiple parties contribute to the successful delivery of new projects, including NIE Networks, the UR, the Department for the Economy (DfE), the Department for Infrastructure (DfI), local councils and planners. SONI will continue to work with these parties through initiatives such as the DfE's Grid Development Monitoring Group to identify ways to accelerate the delivery of new transmission infrastructure.

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## 4.2 Grid delivery / Estimated Completion Dates

### **Confidential response**

*[The respondent] is also concerned at the lack of transparency regarding the delivery of expected Associated Transmission Reinforcements (ATRs). Our analysis of the delivery dates for several ATRs indicate that the delivery dates and scope can change with little to no explanation for the changes.*

### **Consumer Council for Northern Ireland**

*The list of factors that are causing extended project timescales (or may cause in the future), makes it clear that careful planning and coordination with others is required. Equally important are the policy and process changes required to support more streamlined planning, and the development and implementation of new and upgraded assets.*

### **Energia**

*Energia emphasises the importance of timely delivery given the context of sliding delivery timescales when comparing key projects with previous TDP timelines. It should be noted that many of the revised estimated completion dates for projects now fall beyond 2030, making the achievement of 2030 targets increasingly challenging.*

### **EP UK Investments**

*EPUKI believes the TDP should identify for each project:*

- *Start and End dates for each Project Stage from the initial Baseline programme;*
- *Start and End dates for each Project Stage from any subsequent Exception programme due to delays; and*
- *Where there has been a delay to a project or a change to a project's Estimated Completion Date, the reasons for this, as well as any remedial action associated with the delay should be identified.*

### **Foyle Port**

*We remain very concerned that the timescales set out in the TDP are unnecessarily protracted and incurring significant ongoing delays. This is giving rise to significant concerns for Foyle Port and its investors and could derail projects which are of regional and national importance. We note with concern that in its "SONI Cost & Performance Report – October 2020 to September 2024" publication, the Utility Regulator highlighted that the average delay to SONI's TDP projects is 37 months, whilst the delay to the Coolkeeragh Substation project is already at 20 months and likely to increase. We believe that such delays are unacceptable and present the most significant risk to current and future projects, to the detriment of NI plc.*

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*Whilst we appreciate that delays might be caused by factors outside of SONI's control we strongly believe that there are actions that can be taken to manage and mitigate delay risks.*

### **Mutual Energy Ltd.**

*The key point of note to Mutual Energy Ltd. in the TDPNI 2025-34 is that the completion date for [the Moyle Interconnector Capacity Increase] is now 2030 compared to the previous TDPNI publication which had a 2028 completion date. This has been a trend over the last few iterations ... Whilst we recognise that these have always been estimated completion dates, it would be useful for the drivers behind these movements to be fully explained in the document.*

### **RenewableNI**

*SONI's own strategic publications, including Shaping Our Electricity Future (SOEF) and Tomorrow's Energy Scenarios (TES), explicitly recognise the need for accelerated transmission development to enable delivery of 80% renewable electricity by 2030. These documents set out the scale of infrastructure and system transformation required and make clear that timely delivery of major network reinforcements is fundamental to achieving these outcomes. However, the delivery timelines now set out in the draft TDP do not reflect the urgency or pace implied by these strategies. The continued slippage of key projects raises serious questions about whether the delivery pathway set out in the draft TDP is aligned with SONI's own strategic assumptions...*

*Section 1.8 of the draft TDP briefly acknowledges that delays exist but does not analyse their causes or scale. RNI believes this section should be significantly expanded. The expansion should include a clear identification of the specific reasons behind repeated slippage, a charting of delay trends across multiple TDP cycles and an explanation of why so many reinforcements continue to experience multi-year deferrals. Without this level of transparency, it is impossible for industry, government or regulators to understand whether delays stem from planning, resourcing, procurement, land access, technical design or internal programme-management constraints.*

*While RNI recognises the challenges posed by the planning system, SONI must demonstrate accountability for delivery against its own schedules. It is not acceptable that completion dates continue to move back without clear explanation or mitigation. The failure to deliver these projects has tangible consequences with fewer renewable projects connecting, increased levels of dispatch down, higher costs to consumers and lost carbon-reduction potential.*

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## Our Response

SONI recognises the important role we play and the challenges faced across the electricity industry in delivering new network infrastructure and helping Northern Ireland achieve its collective climate ambitions. Successful delivery of new grid infrastructure requires input from many organisations, including NIE Networks, the UR, the DfE, the DfI, local councils and planners, and public and political support in areas where projects are proposed.

SONI acknowledges the frustration over delays to Estimated Completion Dates (ECDs) highlighted by many of the respondents. SONI and NIE Networks have set out in Section 6 of the draft TDPNI 2025-2034 the various reasons why the ECDs have changed across the portfolio. Given the comprehensive review and analysis performed by the JPMO in determining more robust ECDs, SONI and NIE Networks believe that these re-baselined dates set out in the draft TDPNI 2025-2034 are those that grid delivery progress should now be measured against. A number of respondents asked for additional project status and delivery information beyond that required by the TDPNI; SONI and NIE Networks have committed to providing additional information as part of the published JPMO quarterly updates, a less prescriptive, more appropriate, and frequent communications channel than the TDPNI. Since the consultation of the draft TDPNI 2025-2034, the JPMO has published its first quarterly update in February 2026.

In recognition of the industry wide responsibility for delivering new infrastructure, the DfE has established a number of working groups including an '80 by 30' working group and the Grid Development Monitoring Group, to understand what projects are required, and how collaboration across government and industry can deliver these more efficiently and effectively. SONI actively participates in these groups to seek a collaborative effort in understanding the challenges, importantly to overcome them and determine measures to improve the delivery of new infrastructure.

SONI has obligations under Licence Condition 20 to plan the transmission system in an efficient, co-ordinated and economical manner. We also have obligations under Licence Condition 25 to issue a connection offer to any person that applies. In recent years, we have experienced significant tension between these two obligations as a result of the current "developer led" approach and the increased demand for transmission connections.

SONI is currently progressing a transmission clustering policy to more efficiently integrate new connections while also reducing the amount of new transmission network required to deliver firm access.

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### 4.3 Asset refurbishment and maintenance

#### Confidential response

*Given the high levels of constraints currently being experienced in Northern Ireland, [the respondent] is of the view that this Transmission Development Plan places too much emphasis on maintenance and replacement activities that are expected to be delivered. [the respondent] strongly recommends that SONI's Transmission Development Plan (TDP) needs to focus on the role network development must play to reduce the excessive levels of constraints being experienced currently in NI, as well as ensuring that the future network can deliver Northern Ireland's 2030 target of 80% renewables*

#### Our Response

The TDPNI fulfils a statutory obligation set out in Condition 40 of the SONI licence that covers both network development and asset replacement. The Licence requires the TDPNI to include main transmission infrastructure that is required to be built or upgraded. SONI is not able to alter the scope of the document. NIE Networks, as Transmission Owner (TO), is responsible for asset replacement projects, and the funding was approved by the UR through the RP7 process. Details of that can be found on the UR website<sup>4</sup>.

The Northern Ireland transmission system as it exists today was developed in large part between the 1950s and 1980s. As a result, many of the assets which comprise the transmission system have reached or are approaching the end of their design life, to the point where acceptability of the risk of failure dictates that we must be conservative with regard to their operation, rather than permissive. This is increasingly impacting large and critically important transmission assets.

Five of the ten 275 kV substations in Northern Ireland have been identified as requiring major refurbishment. Each of these is a complex project requiring careful optioneering and outage programming to ensure that security of supply is maintained at all times and the network remains safe and reliable long into the future.

Under Licence SONI must operate, as well as plan and develop, the transmission system, and is responsible as the TSO for security of supply. Facilitating the connection of technologies that can support Northern Ireland's climate ambitions, and any associated network reinforcements is an important part of our role, but we must also ensure the existing transmission network continues to be reliable, safe and operable.

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<sup>4</sup> <https://www.uregni.gov.uk/nie-networks-rp7>

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SONI must balance these competing priorities as we work to deliver network development projects. As such it is imperative that due consideration is given to asset replacement projects.

Delivery of asset refurbishment is as important as the delivery of new infrastructure; a well-maintained network removes potential constraints imposed by asset condition and avoids outages due to equipment failure (which can in turn lead to the delay or deferral of planned works due to the risk to security of supply and the diversion of resources to repair works).

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## 4.4 Connecting Future Renewable Generation

### RenewableNI

*RNI finalised its annual pipeline survey in June 2025 and supplemented this with data from the RenewableUK Energy Pulse platform. It shows that at that time, the following projects were in development - under construction, consented, in planning, or in the pre-planning:*

- 2,171MW of onshore wind
- 3,320MW of offshore wind
- 362MW of solar PV
- 4,006MW of battery storage

*These figures illustrate the scale of renewable projects now moving through the pipeline, underscoring the urgent need for corresponding transmission capacity.*

*The pipeline identified by RNI broadly aligns with the generation volumes SONI itself is planning for. The challenge is not a divergence between industry ambition and system assumptions, but the growing gap between these anticipated levels of generation and the pace of transmission delivery set out in the draft TDP.*

### Confidential response

*[the respondent] notes that this draft TDP points to a doubling of non-dispatchable capacity in NI, our assumption is that this principally refers to wind and solar capacity. This TDP needs to clearly set out how it will seek to facilitate this. Based on the draft published it is not clear to us how this can be achieved.*

### Our Response

SONI would like to thank RenewableNI for its continued productive engagement regarding the pipeline of project data and note its importance in the evaluation of needs and optioneering assessment for new projects. It supports our work in identifying transmission systems development needs.

SONI's Proposed Transmission Cluster Policy specifically seeks to address delivery of transmission infrastructure to specifically support connections in areas where there is transmission network capacity and generation projects in development. This is a change to transmission planning in our 'developer-led' connections model in Northern Ireland. This policy aims to develop these grid solutions in an anticipatory manner, rather than reactive, as has been the case to date under the current regulatory regime. A number of proposed transmission clusters have been included in the draft TDPNI 2025-2034.

Through the JPMO and via participation in initiatives such as the DfE's Grid Development Monitoring Group, SONI continues to proactively seek ways to accelerate the delivery of

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new transmission infrastructure with all stakeholders involved in the grid delivery process for these essential network upgrades.

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## 5 Summary of feedback not within the scope of the consultation

### 5.1 Establishing the Joint Programme Management Office

#### **Confidential response**

*[the respondent] acknowledges that the new Joint Project Management Office (JPMO) has been established between SONI and NIEN, and that this may have contributed to the lack of updates in recent months. Given the JPMO has now been established it is imperative that regular updates on the delivery timeframe for the ATRs recommence as soon as possible, it has been more than 18 months since SONI last published any reports on ATR delivery. Notwithstanding the opportunity the TDP can provide in ensuring SONI has a regular publication detailing changes to ATRs, this should not prevent regular in year reports on the progress of ATRs.*

#### **Consumer Council for Northern Ireland**

*The Consumer Council is encouraged to see that SONI and NIE Networks have entered into a cooperative approach to project development. We hope that the Joint Programme Management Office (JPMO) will lead to improved outcomes, including improved stakeholder reporting on the timescales and impacts of individual projects and faster delivery.*

#### **Energia**

*Energia welcomes the establishment of the Joint Programme Management Office (JPMO) and supports the move toward a more holistic, coordinated approach to system planning between the System Operators. Regular updates from the JPMO on the network delivery portfolio and ATR status reports will be vital to maintaining transparency and enabling developers to plan effectively.*

#### **EP UK Investments**

*In January 2025 SONI indicated that it had established a new Joint Project Management Office ('JPMO') to establish further and deeper collaboration between SONI and NIE Networks. It was understood that updates from the JPMO would replace or supersede the established Associated Transmission Reinforcement ('ATR') updates. The January 2025 Update Notice states that "these updates will be made publicly available in due course".*

*EPUKI is requesting an update on progress with the implementation of new reporting under the JPMO. Specifically, any changes to the structure, timing, and content of JPMO updates compared to the established ATR reports is important to understand. Additionally, the reintroduction of frequent status reports to industry is requested as soon as possible. These updates are important to keep industry informed of progress and delays to key*

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*infrastructure projects and the greater frequency provides benefit compared to the annual TDP publication.”*

### **iPower**

*We also welcome the establishment of the Joint Programme Management Office (JPMO). We consider this a positive step that is likely to result in a more streamlined, coordinated, and standardised approach to the development and communication of project timelines, as well as improved alignment of priorities across the transmission delivery portfolio. Greater portfolio-level coordination should enhance deliverability, transparency, and confidence for market participants.*

### **Mutual Energy Ltd.**

*We note that the latest draft TDPNI states that “SONI and NIE Networks are committed to continuously seeking opportunities to bring Estimated Completion Dates forward, and to enhance transparency, will provide quarterly updates on these dates”. This is a positive commitment and we would welcome clarity on the form of these updates.*

### **RenewableNI**

*While RNI welcomes SONI’s establishment of the JPMO, the draft TDP’s framing of the JPMO around revised timelines and ‘re-baselining’ risks signalling delay management rather than delivery acceleration.*

*The UR’s mid-term review of SONI published in December 2025 confirms that capital underspend to date largely reflects project slippage rather than delivery, and that SONI is behind its own expectations for major transmission projects. This assessment reinforces the need for clear delivery milestones and transparent progress reporting.*

*Under the JPMO framework, SONI should publish clear, regular progress metrics tracking projects by delivery stage, estimated completion date and key dependencies, in order to provide meaningful transparency to stakeholders.*

*RNI urges SONI and NIE Networks to ensure that the JPMO publishes regular, quarterly delivery updates as a minimum, clearly setting out milestones, dependencies and any changes to completion timelines, supported by robust and evidenced explanations for slippage.*

*It is equally important that this information is shared consistently with the Grid Development Monitoring Group and the Renewable Grid Liaison Group, where industry and government stakeholders rely on accurate updates to assess risk, investment timelines and security-of-supply implications. These fora cannot provide meaningful oversight if they are not*

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*furnished with timely, detailed reports on project delays, re-baselining decisions, or changes to ECDs.*

*By contrast, EirGrid's Network Development Plan updates are published on a regular quarterly basis. While not without limitation, they at least provide stakeholders with a consistent baseline view of progress and delay. The absence of any equivalent, routine reporting in Northern Ireland is increasingly difficult to justify.*

### **Our Response**

SONI welcomes the broadly positive feedback to the establishment of the JPMO with NIE Networks. The draft TDPNI 2025-2034 effectively launched the ECDs determined by the JPMO.

A number of respondents asked for additional project status and delivery information beyond that required by the TDPNI.

SONI and NIE Networks have committed to providing additional information as part of the published JPMO quarterly updates, a more appropriate, less prescriptive and frequent communications channel than the TDPNI. Since the consultation of the draft TDPNI 2025-2034, the JPMO has published its first quarterly update in February 2026.

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## 5.2 Dispatch down

### **Confidential response**

*We are concerned that not enough information has been provided to demonstrate how the projects in the TDP will adequately address issues such as dispatch down. It is important that the [TDP] demonstrates how current level of dispatch down will be reduced. SONI should also set out how this TDP relates to the dispatch down action plan that is referenced.*

### **Energia**

*Energia welcomes the actions set out in SONI's Dispatch Down Action Plan as important interventions to mitigate dispatch down in the short-term. These measures, however, must be delivered in parallel with a long-term enduring solution in the form of substantial grid development and reinforcement. Timely, and where possible accelerated, delivery of the grid development and reinforcement projects outlined in the TDP is therefore imperative as Northern Ireland cannot afford further delay on any of the transmission projects identified in the TDP.*

### **RenewableNI**

*High levels of dispatch down continue to present one of the most significant barriers to achieving Northern Ireland's renewable electricity targets. The projects outlined in the draft Transmission Development Plan 2025-2034 will be critical in addressing network constraints that have persisted and, in many areas, worsened since 2018.*

*SONI's Draft Dispatch Down Action Plan, published in December 2024, recognises that current levels of dispatch down are unsustainable and must be substantially reduced to enable delivery of 80 by 30. The Action Plan identifies several root causes - including transmission bottlenecks, system-stability limits linked to minimum generation requirements and insufficient system flexibility - and commits to developing technical and market solutions in collaboration with industry.*

*While RNI welcomes the publication of this Action Plan as an important step forward, it must now translate into delivery with measurable milestones and transparent reporting. The plan itself acknowledges that Northern Ireland experiences higher levels of curtailment and constraints than the Republic of Ireland, and that these levels are expected to rise as renewable penetration increases without corresponding infrastructure upgrades.*

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## Our Response

The TDPNI is a statutory document under the SONI licence that delivers an obligation placed on NI through EU law. As highlighted in these responses, we have a separate workstream, in close collaboration with industry and government, that is delivering our work to reduce dispatch down whilst we continue to deliver grid infrastructure.

Although outside the scope of the TDPNI consultation, SONI acknowledges the significant increase on the level of dispatch down in recent years. These levels of dispatch down are largely as a result of prevailing market conditions driving higher imports from EU/GB markets and constraints relating to the limitations on the existing North South interconnector. This constraint will not be resolved until the second North South Interconnector is energised. Despite legal challenges, construction of this has commenced in Northern Ireland and is expected to commence in the Republic of Ireland later this year.

SONI has been proactive in engaging with stakeholders on the present high levels of dispatch down, with several workshops held in recent years, communicating clearly the specific issues and challenges, and proposing solutions through the development of the Dispatch Down Action Plan.

SONI is developing a transmission clustering policy to more effectively connect large volumes of renewable generation into areas of the network with capacity and therefore less susceptible to constraints.

Through the JPMO and through participation in groups such as the DfE's Grid Development Working Group, SONI is committed to working with all parties who have a role to play in the delivery of new infrastructure to identify opportunities to accelerate delivery and create increased capacity across the transmission network.

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### 5.3 Firm Access Arrangements and flexibility measures

#### **Energia**

*All efforts should be undertaken to alleviate the seriously high level of network constraint...*

*Energia welcome SONI's stated intention to undertake a Flexibility Needs Assessment (FNA) to inform flexibility targets and the role of Long Duration Energy Storage (LDES) in NI. However, as demonstrated by EirGrid's approach, SONI can consult prior to the FNA, on the market arrangements required to enable LDES deployment. Early engagement with industry on market design, revenue mechanisms and operational frameworks will be critical to ensuring that LDES can be delivered at scale and in a timeframe aligned with NI's system needs.*

#### **iPower**

*Demand-side flexibility is a vital complement to network reinforcement, supporting system security, efficiency, and decarbonisation.*

*As a demand-side aggregator, iPower strongly believes that enabling Maximum Export Capacity (MEC) sharing with renewable generation would deliver material benefits for consumers while directly supporting the objectives of the TDPNI...*

*This approach would allow SONI to maximise the value of the existing network and deliver additional effective capacity without additional build costs or extended delivery timelines, supporting timely decarbonisation. The concept of MEC sharing is already under active consideration by the CRU, and iPower would encourage a similarly pragmatic, low-barrier approach to be explored in Northern Ireland at both transmission and distribution levels.*

#### **RenewableNI**

*At a time when Northern Ireland urgently needs to accelerate renewable connections and deliver grid reinforcements at an unprecedented pace, the continued absence of a functioning Firm Access Policy remains a critical barrier to progress. While RNI recognises that SONI and the UR are undertaking further analysis on firm access arrangements, the current framework, which ties the allocation of firm access to the physical completion of ATRs, is no longer fit for purpose.*

*The lack of a functional firm access framework compounds the impact of these delays and further undermines investor confidence in Northern Ireland's grid delivery process.*

*Developers, owners, operators and investors have no clear visibility on when their projects will be made firm, resulting in projects remaining in financial limbo. This uncertainty discourages investment at the very stage when rapid deployment is essential to meeting statutory targets.*

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*RNI therefore urges SONI to: ... Facilitate flexibility solutions - including long duration energy storage, demand response and zero-carbon system services - that can lower minimum-generation requirements and maximise renewable utilisation.*

### **Our Response**

SONI acknowledges these responses but it is important to note that the purpose of the TDPNI is to outline transmission investments planned over the next ten years; issues relating to Firm Access Quantities (FAQ) and flexibility measures will be dealt with in their own dedicated workstreams, set out in SONI's Forward Work Plan 2025/26, and SONI is progressing these in 2026. SONI's scope of work on FAQ relates to the calculation methodology and we are supporting the UR in their work to evaluate the FAQ policy we have in Northern Ireland.

The UR is scheduled to deliver the first Flexibility Needs Assessment report for Northern Ireland by the end of July 2026. It is important to highlight that EirGrid's work on Long Duration Energy Storage is a feature of the Irish Statutory framework and there is no equivalent provision in Northern Ireland that SONI could rely on to undertake a similar exercise at this time.

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## 5.4 Probabilistic Assessment

### **Mutual Energy Ltd.**

*This respondent stated that “As we have previously stated in responding to TDPNI consultations, our understanding is that this project addresses a contingency risk that is of very low probability. We have also previously suggested that a probabilistic assessment be completed as to whether Moyle’s full technical capacity could be used ahead of completion of the project (even if only in certain circumstances). Whilst this suggestion has not previously gained traction we remain of the view that such an approach could deliver significant value to NI consumers and would welcome its consideration.*

*We look forward to future engagement in this area and seeing the successful utilisation of the full import and export capacities of the Moyle interconnector at the earliest opportunity.”*

### **Our Response**

SONI is required to plan the Northern Ireland transmission system in accordance with the TSSPS as set out under Condition 20 of the Licence.

SONI must ensure the transmission system remains within safe limits for specified contingency events, including those that may be deemed low probability.

SONI must also ensure that maintenance can be performed on transmission infrastructure and that the system remains within safe limits in the event of contingencies occurring during these maintenance periods.

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## 5.5 Interconnection

### Energia

*Unsustainable levels of dispatch down are compounded by high levels of interconnector imports from GB. In the context of this relationship between GB imports increased dispatch down, Energia urges caution regarding any proposals for further interconnection to GB. Northern Ireland has sufficient interconnection capacity with GB which accounts for a significant portion of existing demand.*

*Additional interconnection risks undermining renewable build out by deterring investment in indigenous generation; increasing system operational complexity; creating new security of supply vulnerabilities to physical sabotage and fewer points of failure; and diverting focus and resources away from urgently needed domestic grid reinforcement.*

*Northern Ireland's energy transition is best supported by strengthening its internal network and enabling greater renewable integration, rather than expanding reliance on GB interconnection.*

### Our Response

One respondent queried the need for additional interconnection between Northern Ireland and GB.

While SONI notes the concerns of the respondent, it is outside of the scope of the TDPNI consultation. We would note that the LirlC Interconnector project has been assessed in three successive European Ten-Year Network Development Plans (TYNDP), most recently in the 2024 publication<sup>5</sup>, where it has performed positively. We also note that the UR published a consultation in December 2025 relating to the need for a regulated operating revenue regime for future interconnection in Northern Ireland.

The TDPNI does not set guidelines for technology and capacity requirements, its purpose is to set out the reinforcements planned on the transmission network over the coming ten-year period. SONI will continue to progress the network reinforcements set out in the draft TDPNI 2025-2034, as we recognise the need to provide additional transmission capacity as well as maintain and refurbish the existing transmission network.

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<sup>5</sup> <https://tyndp2024.entsoe.eu/projects-map/transmission/1040>

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## 5.6 Consumer costs and savings

### Consumer Council for Northern Ireland

*We support SONI's commitment to minimising costs for consumers, balancing trade-offs with security of supply, the transition to net zero and network efficiency. However, it would have been helpful to get some indication of the scale of costs, that will be picked up by consumers over different timeframes.*

*Our core focus, from a consumer perspective, is on successfully navigating the inherent trade-off between cost, security and clean energy. We support SONI's stated commitment to minimise costs to the consumer while robustly delivering on Northern Ireland's clean energy targets and, crucially, maintaining security of supply. We believe that this balanced approach should keep consumers front and centre of decision making.*

*We note that the scale of this plan, with an estimated total cost of approximately £1.31 billion (including £971 million in Transmission Owner costs), is substantial. Whilst some costs will be recovered from renewable generators connecting to the system, it will be important that the impact on customer bills is considered, and efforts made to minimise the impacts, whilst balancing system efficiency, security of supply and progress towards net zero.”*

*The Consumer Council support SONI's approach of adapting and refocusing its priorities to deliver benefits to consumers. We recognise the scale of change required as the energy sector transitions to net zero, both for consumers and the industry. SONI's objective of “doing more for less” will be important in delivering outcomes that are fit for purpose, provide value for money and minimise the impact on consumer bills.*

*We also recognise that SONI must appropriately manage the balance between security of supply and system-wide costs, and this is becoming more challenging as the system becomes more complex as we transition towards net zero.*

*We would have expected to see some commentary on how savings from adopting a Transmission Cluster Policy and from operational savings from network upgrades would feed through to consumers. We also would have liked to see some commentary on the timescales over which any savings would materialise, given the statement that the cost of reinforcement for connections will initially be paid for by consumers and paid back by developers as projects connect. Although the document references the Distribution Cluster Policy, provision of more clarity would be helpful to enable consumers to understand the practical implications.*

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## RenewableNI

*As new support arrangements come forward, including the Renewable Electricity Price Guarantee and future auction-based mechanisms, persistently high constraint and compensation levels risk becoming an increasingly visible consumer bill issue. Grid under-delivery today hard-codes higher long-term system costs, which consumers will ultimately bear if the root causes are not addressed.*

### Our response

The draft TDPNI 2025-2034 provides project level transmission proposals and associated costs, not consumer savings; it does not make, consult on, or determine the outcomes of separate regulatory submissions for individual network development projects or policy instruments. Any consumer benefits associated with policies such as transmission clustering are discussed via their own dedicated regulatory or policy consultations and as such some of the commentary is outside of scope of this consultation.

Preferred options for network reinforcement projects proposed by SONI are determined following a robust optioneering process, which includes both capital cost comparisons and a net present value analysis. This ensures that any proposed network reinforcement not only addresses an identified need but has considered value for money as part of the optioneering process.

We also recognise stakeholder concerns regarding constraints, dispatch down and associated compensation costs, particularly as new support arrangements for renewable generation emerge. These matters are material to system planning. SONI continues to collaborate with NIE Networks, the UR and government partners to improve delivery frameworks, planning coordination and stakeholder engagement to mitigate constraints and enhance value for consumers over time.

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## 5.7 Public engagement

### Consumer Council for Northern Ireland

*The Consumer Council would encourage SONI to continue to liaise with statutory and other stakeholders to keep them informed, including how consumers might be made aware of upcoming consultation events and how the future plans and benefits will be communicated. We believe that such engagement is important to ensure that plans for the transmission network take proper account of local needs.*

*Although the Consumer Council has been made aware of SONI's plans for consumer engagement, we would have liked to see more detail in the document about how SONI plans to address the consumer engagement challenges in order to enable effective information sharing and meaningful consultation at an earlier stage, as this is cited as one of the reasons for planning approval delays.*

### Our Response

Although out of scope for this consultation, SONI recognises the importance of consumer engagement and we have implemented an engagement approach which balances what is required by statutory planning requirements for Pre-application Community Consultation and the expectations of communities. Before statutory Pre-Application Community Consultation (PACC) takes place, our teams typically begin engagement in communities many years in advance of planning submission. This involves extensive communication and engagement activity to explain the projects need and benefits and providing opportunities for stakeholders and communities to help shape our plans at the earliest stages.

Each project has a dedicated Stakeholder Engagement and Communication Plan that places public engagement at the heart of transmission development and is underpinned by our structured three-party grid development process. Meaningful engagement is at the heart of our approach, and we are committed to evolving and improving our engagement in line with energy industry best practice. Following a successful pilot as part of the Mid Antrim Upgrade project, we have developed and in December 2025 published a new Community Forum Framework which focuses on a more deliberative approach to engagement via Community Fora and Citizen Sounding Boards. SONI has an extensive set of engagement activities planned for 2026 and these can be found in our engagement action plan<sup>6</sup>.

SONI is also a member of the new Consumer Engagement Working Group, established to support the implementation of the NI Energy Strategy, and chaired by the Consumer

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<sup>6</sup>

<https://cms.soni.ltd.uk/sites/default/files/publications/Stakeholder%20Engagement%20Action%20Plan%202025-2026.pdf>

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Council. We are fully committed to playing our part, along with partners on this working group, in helping to improve consumer awareness, understanding and education and deliver a connected and coordinated consumer engagement programme.

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## 6 Summary of changes to the draft TDPNI following the consultation

We have made a small number of changes to the draft TDPNI 2025-2034 that was published for consultation on 17 October 2025, and they are as follows:

- We have provided additional information on the use of Dynamic Line Rating in the Executive Summary.
- We have updated costing information in the Executive Summary to account for updated cost information for the Connect West project.
- We have updated the cost of the Connect West projects in section 8.3.2 to reflect updated costing information.
- We have updated the description of the Kilroot Transmission Cluster in section 8.4.4 to refer to a candidate reinforcement in the *Shaping Our Electricity Future* roadmap;
- We have updated the description of the Lisburn Upgrade in section 8.4.4 to refer to a candidate reinforcement in the *Shaping Our Electricity Future* roadmap; and
- We have corrected an error in table B.4 regarding the ECD of the Coolkeeragh – Strabane 110 kV upgrade.
- We have updated the TSO costs of the Connect West reinforcement in table B.4 to reflect updated costing information.

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## Appendix A

<b>ATR</b>	Associated Transmission Reinforcement
<b>CLUD</b>	Certificates of Lawfulness for proposed use or development
<b>CRU</b>	Commission for Regulation of Utilities (Republic of Ireland)
<b>DfE</b>	Department for the Economy
<b>DfI</b>	Department for Infrastructure
<b>DLR</b>	Dynamic Line Rating
<b>ECD</b>	Estimated Completion Date
<b>EPUKI</b>	EP UK Investments
<b>EU</b>	European Union
<b>FAQ</b>	Firm Access Quantity
<b>FNA</b>	Flexibility Needs Assessment
<b>GB</b>	Great Britain
<b>GDMG</b>	Grid Development Monitoring Group
<b>JPMO</b>	Joint Programme Management Office
<b>KPI</b>	Key Performance Indicator
<b>LDES</b>	Long Duration Energy Storage
<b>MEC</b>	Maximum Export Capacity
<b>MEL</b>	Mutual Energy Ltd.
<b>NIEN</b>	Northern Ireland Electricity Networks
<b>OHL</b>	Overhead line
<b>PACC</b>	Pre-Application Community Consultation
<b>RES-E</b>	Renewable Energy Sources - Electricity
<b>RNI</b>	Renewable NI
<b>RP7</b>	Regulatory Period 7
<b>SEM</b>	Single Electricity Market
<b>SOEF</b>	Shaping Our Electricity Future
<b>SONI</b>	System Operator for Northern Ireland
<b>TDPNI</b>	Transmission Development Plan Northern Ireland
<b>TES</b>	Tomorrow's Energy Scenarios
<b>TO</b>	Transmission Owner
<b>TSO</b>	Transmission System Operator
<b>TSSPS</b>	Transmission System Security and Planning Standards
<b>TYNDP</b>	Ten-Year Network Development Plan
<b>UR</b>	Utility Regulator