

Report on the Utility Regulator's
Consultation on Transmission
Development Plan Northern Ireland
2019–2028



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Abbreviations

ATR	Associated Transmission Reinforcement
DSO	Distribution System Operator
EC	European Commission
HRA	Habitats Regulations Assessment
SEA	Strategic Environmental Assessment
SONI	System Operator Northern Ireland
TAO	Transmission Asset Owner
TDPNI	Transmission Development Plan Northern Ireland
TIA	Transmission Interface Arrangements
TSO	Transmission System Operator
TSSPS	Transmission System Security and Planning Standards

Glossary

Associated Transmission Reinforcement (ATR)	ATRs are the transmission reinforcements that must be completed in order for a generator to be allocated Firm Access Quantity (FAQ). ATRs include reinforcements such as line and busbar upratings, new stations and new lines.
EirGrid	The Transmission System Operator in the Republic of Ireland.
NIE Networks	Northern Ireland Electricity Networks, the Transmission Asset Owner, Distribution Asset Owner and Distribution System Operator in Northern Ireland.

Introduction

As the Transmission System Operator (TSO) for Northern Ireland, we are responsible for the development of the Northern Ireland transmission network. We are obliged to plan the development of a safe, secure, reliable, economical, and efficient transmission network to meet all reasonable demands for electricity, in accordance with our legal obligations.

We plan the development of the transmission network taking account of the long-term electricity system needs and the relative performance of various development options.

We have both statutory¹ and licence² obligations to produce a Transmission Development Plan for Northern Ireland (TDPNI) annually. Before the TDPNI can be approved, SONI is obliged to hold a consultation on the draft TDPNI², Strategic Environmental Assessment and Habitats Resource Assessment. This was undertaken in November – December 2019. Based on the responses to the consultation we updated the draft TDPNI, where necessary, and submitted a consultation report alongside the updated TDPNI to the Utility Regulator (UR). This can be viewed on the SONI website³.

¹ EU Directive 2009/72 (Article 22)

² SONI TSO Licence (Condition 40)

³ The report on the SONI consultation can be found here:

<http://www.soni.ltd.uk/media/documents/Report-on-Draft-TDPNI-2019-2028-SONI-Consultation.pdf>

Following this, the UR held a public consultation on the draft TDPNI⁴ in accordance with its obligations.

This document is the consultation report on the UR's TDPNI 2019–2028 consultation. It describes the consultation process and provides an overview of the submissions received and our responses to the issues raised.

Description of Consultation Process

SONI held the public consultation on the draft TDPNI 2019–2028 from 21 November to 19 December 2019.

SONI then produced a consultation report which was submitted to the UR. This report and the responses received were published on the SONI website⁵.

The UR then undertook a consultation on the updated TDPNI from 24 March – 5 May 2020. This report details SONI's response to the responses received in the UR consultation. The TDPNI itself is subject to UR approval before the TDPNI is formally adopted. At this point SONI will also publish an Environmental Appraisal Report of the TDPNI against the Strategic Environmental Assessment for TDPNI 2018–2027.

Purpose of the Transmission Development Plan

Local and European strategic energy policy objectives set the context for investment in the Northern Ireland transmission system. To achieve these strategic objectives, it is necessary to invest in the development of the electricity transmission system.

⁴ European Directive 2009/72 (Article 22)

The primary objective of the TDPNI is to describe the transmission network developments planned for the next ten years. The TDPNI explains:

- Our approach to network development;
- The drivers for investment, both policy drivers and technical drivers;
- The needs of the transmission network; and
- The planned network developments with expected project completion dates.

In so doing, the TDPNI raises awareness of planned network reinforcements.

Responses to the Consultation

The UR received six submissions in response to the consultation. These were from:

- KellsVOCAL;
- Moyle Interconnector Limited;
- Northern Ireland Renewables Industry Group (NIRIG);
- Sinead McLaughlin MLA;
- SSE; and
- One anonymous response.

We would like to thank all parties for their responses. These responses can be viewed on the Utility Regulator's website.

A number of points were raised in these submissions which do not relate directly to the TDPNI. Some of these involve queries for the Utility Regulator, who will engage directly with the respondents.

The rest of this report deals with the issues relevant to the TDPNI 2019–2028 raised in these submissions. In the following sections we summarise and respond to the issues raised.

Summary of feedback

Timeliness of TDPNI 2019–2028

SSE

“SSE’s key concern is on the period covered by the draft TDPNI, namely 2019 – 28. It is also of concern that a data freeze was applied from 1 January 2019, therefore the data referenced here is already 16 months old.

With a data freeze of 2019 we are confused as to how this meets the requirement of condition 40(1)(a) which states that the TDPNI shall in particular “indicate to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years” (emphasis added). It should also be noted that Directive 2009/72/EC makes the same requirement in relation to the next ten years.”

NIRIG

“The data freeze date and subsequent gap of over a year before TDP publication is an issue which means that information provided is often out of date and of little benefit to industry. NIRIG believes that it should be feasible and would be beneficial for SONI to publish on its website a live register of grid development projects. The live register would provide information on all ongoing or planned grid development projects as well as Associated Transmission Reinforcements (ATRs)”

Our response

TDPNI 2019–2028 was published in draft form by SONI for consultation in November 2019. Licence requirements and European regulations necessitate a two-stage consultation process, which delays finalisation of the document. While the draft document was available ten months after the data freeze date, the process was delayed by the finalisation of the TDPNI 2018–2027, which was published in July 2019 and was the first such document published by SONI.

We anticipate that TDPNI 2020–2028 will be published in draft form in late Summer 2020 and are working to reduce delays in publication on an annual basis. SONI recognises the importance of timely information provision. Within the business plan that we submitted to the UR, covering the period out to 2025, we have included initiatives that would improve the flow of information about network

development and ATRs. We will continue to engage with the UR on the price control process to ensure that it provides a framework that facilitates SONI in its delivery of the outcomes that consumers value.

Tomorrow's Energy Scenarios (TES)

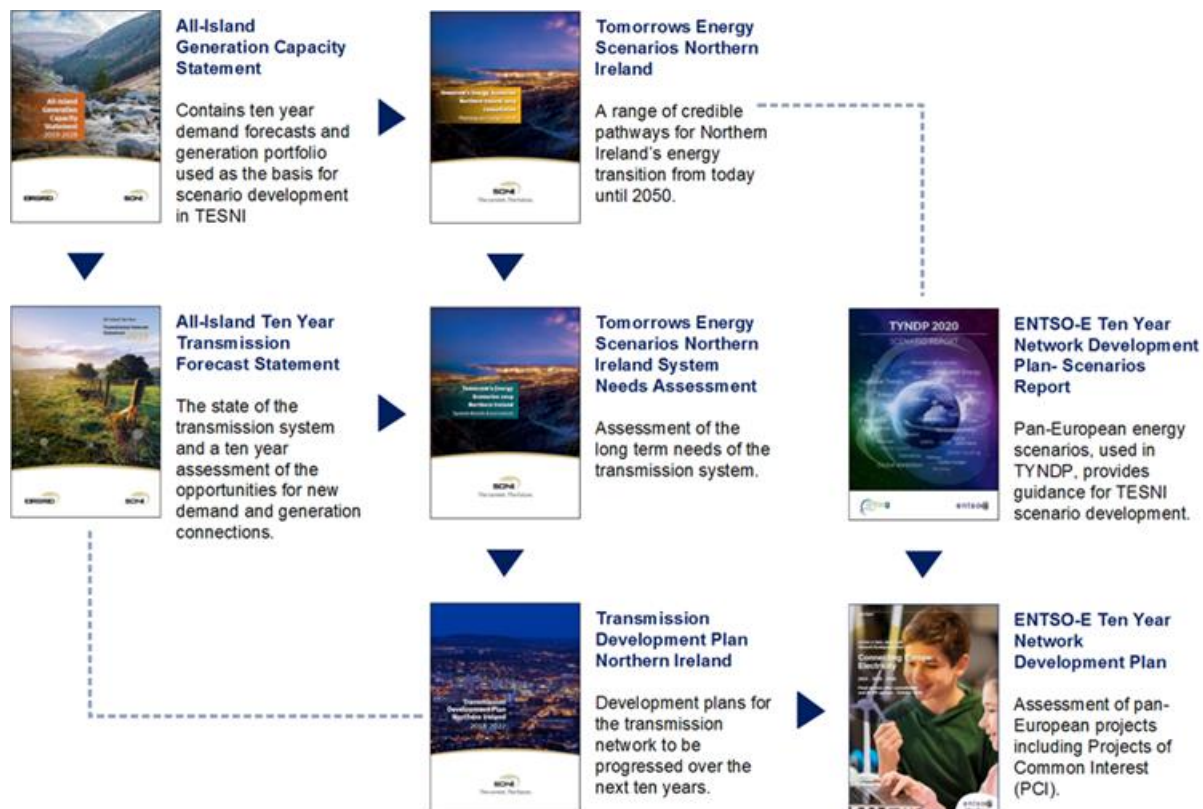
NIRIG

“NIRIG also responded to the TES consultation and would find it helpful for SONI to outline timeframe in which the TES will be completed and how the system needs identified will translate into grid reinforcement projects via the TDP and other related documents.”

Our response

The TES is due for publication in the coming weeks, and will be used to inform future TDPNIs. The system needs identified in the TES will be used to evaluate existing SONI projects as well as inform any new projects which may be deemed necessary.

The below graphic (taken from the upcoming TES) shows the relationship between the statutory documents produced by SONI. It will be included in future versions of the TDPNI.



Connecting Existing and Future Generation

NIRIG

“As highlighted by our colleagues in Scottish Power Renewables [in the SONI consultation], the lack of progress on ATRs for existing generation is an ongoing frustration for the renewables industry. In anticipation of an increased target for renewables in the forthcoming energy strategy there will be a need for significant investment in ATRs for future generation. This is an area where NIRIG would be keen to see improvement of delivery.”

Our response

SONI anticipates that there will be a continuing need to connect new renewable generation to the transmission system, and we have included grid development projects in the TDPNI that we believe will help facilitate this further growth. The approval of the TDPNI is an important milestone for the projects included within it.

SONI has reflected an increasing need for grid development projects that will relieve transmission constraints within its business plan for the next price control period. We will engage with both the UR and industry to ensure that the price control facilitates timely development of network infrastructure.

Grid Capacity in the Northwest

Sinead McLaughlin MLA

“We are concerned that some businesses have advised us that they have been unable to invest in the north west because of grid capacity restrictions. We therefore believe it is essential to strengthen electricity grid capacity in the north west.”

Our response

Reinforcement of the network in the North West forms a key part of the TDPNI. SONI has identified a number of projects in the North West which will increase network capacity in the area for both generation and demand. These projects will be particularly important if the Department of the Economy implements a new energy policy requiring further increases in renewable generation.

Impact on Communities

KellsVOCAL

*“The Draft TDPNI simply focuses [on] the necessary improvements to the transmission system but should at the same time identify problems and risks for the projects in relation to impacts on the communities likely to [be] affected...
... We think therefore that the Transmission Plan [sic], in the reporting of individual project areas and the planned works, should have at the same time a*

column identifying why the works are required eg noise mitigation for illegal operation.”

Our response

SONI notes that a number of the points raised by the KellsVOCAL group relate to broader issues and we understand that the UR will be addressing those. SONI will be engaging with all relevant stakeholders on all relevant projects as the detail of optimal solutions emerge. We therefore do not respond to points of detail here, because we will be engaging on these project specific matters as part of our consultation exercises.

All SONI network development projects have high-level needs and drivers identified in section 6 and Appendix B of the TDPNI.

Asset replacement projects described in the TDPNI are undertaken by NIE Networks. All asset replacement projects scheduled for completion by 2024 are part of NIE Networks’ RP6 (2017–2024) business plan, which was consulted on by the Utility Regulator in 2017. All subsequent projects are an estimate of what will be necessary during the RP7 business plan period, which will also be consulted on in due course.

To aid clarification, we will include references to the NIE Networks RP6 business plan submission for all RP6 asset replacement projects in future versions of the TDPNI.

Kells Interbus Transformer Replacement

KellsVOCAL

“We were therefore surprised to see in the updated Draft TDPNI 2019–2028 that the replacement of these two transformers... were no longer in the plan for replacement:

Kells Inter-bus Transformer 1 and 2 Replacement

Cancelled

This was corrected in the revised document on the UR's website Section 1.8 which states that the following changes have occurred between 01-01-2019 and February 2020:

Kells Cluster Estimated completion date Summer 2024 Kells Inter-bus Transformer 1 Replacement Erroneously stated as cancelled during the SONI consultation on TDPNI 2019-2028 – this project is going ahead and is expected to be completed by 2024.

The omission was not an error.”

Our response

The removal of the ‘Kells Inter-bus transformer 1 and 2 Replacement’ project was an unfortunate error arising from a misunderstanding of changes to the NIE Networks Asset Replacement programme. NIE Networks do plan to replace transformer 1 in 2024, rather than both as previously stated. SONI and NIE Networks are constantly working to improve communication and co-operation and any changes to the Asset Replacement programme will be communicated in future TDPNIs.

Appendix A - Impact on TDPNI 2019–2028

Source	Topic	New Comments since SONI Consultation	Impact on TDPNI 2019-2028
SSE	Timeliness of TDPNI publication	<p>“SSE’s key concern is on the period covered by the draft TDPNI, namely 2019 – 28. It is also of concern that a data freeze was applied from 1 January 2019, therefore the data referenced here is already 16 months old.</p> <p>With a data freeze of 2019 we are confused as to how this meets the requirement of condition 40(1)(a) which states that the TDPNI shall in particular “indicate to market participants the main transmission infrastructure that needs to be built or upgraded over the next ten years””</p>	Explanatory diagram will be published in future TDPNIs
NIRIG		<p>“The data freeze date and subsequent gap of over a year before TDP publication is an issue which means that information provided is often out of date and of little benefit to industry. NIRIG believes that it should be feasible and would be beneficial for SONI to publish on its website a live register of grid development projects. The live register would provide information on all ongoing or planned grid development projects as well as Associated Transmission Reinforcements (ATRs)”</p>	
NIRIG	Tomorrow’s Energy Scenarios	<p>“NIRIG also responded to the TES consultation and would find it helpful for SONI to outline timeframe in which the TES will be completed and how the system needs identified will translate into grid reinforcement projects via the TDP and other related documents.”</p>	None
NIRIG	Connecting Existing and Future Generation	<p>“As highlighted by our colleagues in Scottish Power Renewables [in the SONI consultation], the lack of progress on ATRs for existing generation is an ongoing frustration for the renewables industry. In anticipation of an increased target for renewables in the forthcoming energy strategy there will be a need for significant investment in ATRs for future generation. This is an area where NIRIG would be keen to see improvement of delivery.”</p>	None

Source	Topic	New Comments since SONI Consultation	Impact on TDPNI 2019-2028
Sinead McLoughlin MLA	Grid Capacity in the Northwest	"We are concerned that some businesses have advised us that they have been unable to invest in the north west because of grid capacity restrictions. We therefore believe it is essential to strengthen electricity grid capacity in the north west."	none
KellsVOCAL	Impact on Communities	"The Draft TDPNI simply focuses [on] the necessary improvements to the transmission system but should at the same time identify problems and risks for the projects in relation to impacts on the communities likely to [be] affected... ... We think therefore that the Transmission Plan [sic], in the reporting of individual project areas and the planned works, should have at the same time a column identifying why the works are required eg noise mitigation for illegal operation."	References will be included to relevant asset replacement projects in NIE Networks RP6 business plan in future TDPNIs
KellsVOCAL	Kells Interbus Transformer 1 and 2 Replacement	"We were therefore surprised to see in the updated Draft TDPNI 2019-2028 that the replacement of these two transformers... were no longer in the plan for replacement: Kells Inter-bus Transformer 1 and 2 Replacement Cancelled This was corrected in the revised document on the UR's website..."	Error has been corrected in final TDPNI