

31 January 2019

SONI Ltd.
Castlereagh House
12 Manse Road
Belfast
BT6 9RT

Re: TDPNI 2018 - 2028

To whom it may concern,

NIE Networks welcomes SONI's consultation on the Ten Year Development Plan (TYDP) for the transmission network in Northern Ireland. As the Transmission Asset Owner, NIE Networks is an important stakeholder in the TYDP as it has licence obligations to develop, construct and maintain the transmission network. SONI is licenced to plan and operate the transmission network and therefore a close working relationship is required to ensure that the Development plan is co-ordinated by both companies, as outlined in the TIA.

From reviewing the draft TYDP, it is not apparent that NIE Networks is responsible for transmission development. NIE Networks would request that SONI update the draft TYDP to reflect the licence obligations on each party. The process for developing transmission projects is set out in the Transmission Interface Arrangements (TIA) and we would welcome further engagement to ensure this document aligns with the roles and responsibilities detailed in the TIA.

In regards to the projects that SONI has set out to be developed over the next ten years, NIE Networks has a number of concerns over the proposed timing of these projects. We note that these dates were considered in January 2018 and a number of projects have moved on since then. However, NIE Networks considers that the draft TYPD should be updated to reflect the latest information and we would welcome workshops with SONI to further refine the delivery dates.

We note that each project in the draft TYDP has a completion date. As NIE Networks' ability to complete load projects is dependent on SONI completing their pre-construction activities, we would suggest that these projects include; (i) the estimated date to obtain pre-construction approval, (ii) the date to have planning approval and landowner consents, (iii) the date to complete construction works. NIE Networks would also suggest that when the draft TYDP is updated, that SONI reviews the feasibility of the transmission system outage programme that would be required to facilitate the proposed plan and identify any interdependencies between projects.

There are a number of references to SONI policies and we consider that as the asset owner there are NIE Networks' policies that SONI should refer to also.

NIE Networks is aware that the draft TYDP is to be consulted upon by the Utility Regulator later in 2019, and we would suggest the following steps are taken prior to that consultation:

1. Meeting to discuss alignment with the TIA and NIE Networks to provide SONI with detailed comments on the current draft TYDP.

2. Workshop(s) to be arranged between both companies to discuss and agree phasing and timing of pre-construction and construction activities for projects.
3. Workshop(s) to be arranged to discuss environmental conditions and their impact on the construction phase of the projects.

We look forward to further engagement with SONI to ensure the TYDP that is presented to the UR is agreed by both parties.

Yours sincerely,



Ronan McKeown
Head of Asset Management