



SONI Annual Performance Report 2023-24

Appendix 7
Self-Assessment

Northern Ireland
December 2024

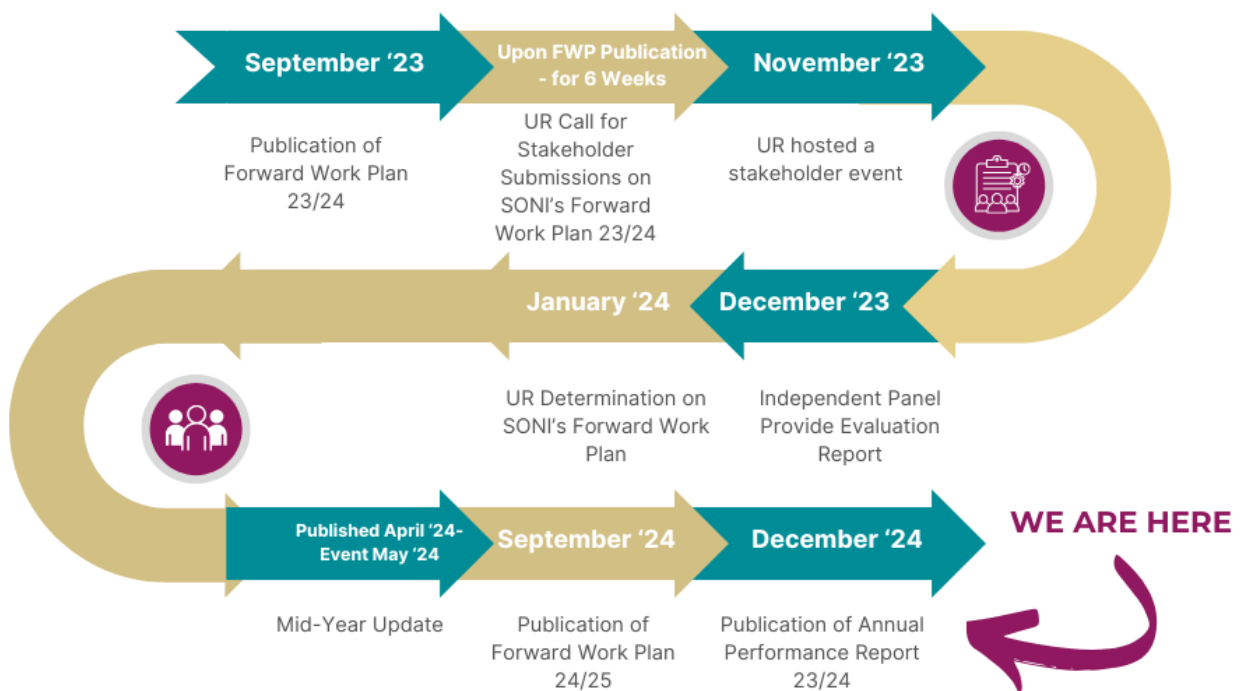
Section 1

Introduction

Overview of the Evaluative Performance Framework Process

The Evaluative Performance Framework was introduced by the Utility Regulator (UR) in order to provide SONI with a performance incentive mechanism as part of the 2020-25 Price Control Final Determination.

This process is summarised in the figure below.



This publication completes the last step in the process above. The UR will request stakeholder submissions on SONI's publication in order to provide feedback from all stakeholder segments to the Independent Panel in order to assist the panel with their evaluation.

Assessment Criteria

SONI is assessed by the Independent Panel using the UR's [Evaluative Performance Framework Guidance](#) document (see Chapter 5, pages 24-29 of the UR's Evaluative Performance Framework Guidance).

The Performance Report is 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.

02 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 its Baseline.

03 ADAPTABILITY

The extent to which SONI has shown successful adaption

Self-Assessment

In the remainder of the document, SONI 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 SONI’s performance for the Forward Work Plan 2023-2024 in the table below.

SONI Self-Assessment against Performance for Forward Work Plan 2023-2024

	Role 1 System Operations & Adequacy	Role 2 Independent Expert	Role 3 System Planning	Role 4 Commercial Interface
Weights	27.5	25	25	22.5
Criterion	Score			
1 Delivery	0	1	0	0
2 Stakeholder Satisfaction	1	1	1	1
3 Adaptability	1	1	1	1
Assessment Total	2	3	2	2
Assessment Grade	4	5	4	4
Overall Performance Report	4.25			

Role 1 System Operations and Adequacy

How the performance meets the assessment criteria

Delivery

23 Milestones:

- ❑ 10 Completed
- ❑ 5 Partially Completed – **Within SONI's Control**
- ❑ 5 Partially Completed – **Outside of SONI's Control**
- ❑ 3 Not Progressed – **Outside of SONI's Control**

We consider that we have **met expectations** for the delivery criterion in Role one. The work involved in this role is inherently complex, often requiring bespoke solution as there are no readily available, off-the-shelf approaches to completion. While challenging, we believe substantial effort and commitment have been dedicated to advancing these projects. We have delivered key aspects of the FASS project, including the publication of two consultation papers and two recommendations paper.

For Scheduling and Dispatch, we have maintained ongoing monthly engagement with the industry, ensuring continuous progress and collaboration. While we have not yet received approval from the Regulatory Authorities for the Trading and Settlement Code, submitted to the in the spring, we have continued to advance the project and have delivered several components within that milestone.

Additionally, the NRAA methodology was submitted to the Regulatory Authorities in June 2024 for approval, however following feedback from the Regulatory Authorities, a revised version was submitted in August 2024. This document is highly complex, and the significant effort and dedication required to deliver it within the relevant timeframe should be commended. SONI consider we have successfully delivered on the aspects within our control and remain committed to ensuring the outstanding milestones are completed as soon as possible.

Stakeholder Engagement/Satisfaction

Throughout the year, we have conducted extensive engagement with key stakeholders to ensure sufficient industry feedback to advance critical projects such as FASS and Scheduling and Dispatch. For FASS, we published two recommendation papers and two consultations which have been instrumental in shaping the project's direction. Similarly, we held monthly industry workshops for Scheduling and Dispatch, fostering collaboration and input from stakeholders. We also hold quarterly Shaping Our Electricity Future Advisory Council meetings.

Our engagement activities have significantly increased, including areas such as the Capacity Auction Market and the ongoing engagement on the NRAA methodology. This has required ongoing collaboration with the Regulatory Authorities to address their concerns and achieve outcomes that balance the interest of all parties.

SONI remain committed to strengthening our relationships and deepening engagement with stakeholders. Compared to the base year 2019 and previous iterations of the Forward Work plan, we believe we have demonstrated a considerable step change in our engagement efforts. Based on these advancement, we consider that we have **exceeded expectations** for this criterion.

Adaptability

We consider that we have demonstrated significant adaptability in this role, particularly in managing a challenging programme of work within the all-island context of many projects. Our ability to respond in an agile manner to shifting regulatory priorities has been critical to our progress. For example, in the FASS project, we effectively adapted to the Regulatory Authorities decision to de-scope two milestones originally include in the plan, ensuring we maintain focus on delivering the remaining milestones.

We advanced work at risk on critical initiatives including Scheduling & Dispatch and the FASS programme, to maintain progress and ensure alignment with our strategic objectives. This demonstrates a very flexible approach where we progressed significant work in parallel to securing funding from the Regulatory Authorities for these projects.

Similarly the development of Control Centre Tool exemplifies our adapting and innovative approach. This highly complex project has no off-the-shelf solution to leverage, require bespoke development to meets its objectives. Once complete, SONI and EirGrid will be the only TSOs in the world with this advanced capability highlighting the groundbreaking nature of our work. These examples illustrate our resilience and flexibility in navigating complex challenges and driving forward transformative projects. As a result, we consider that we have **exceeded expectations** for this criterion,

Role 2 Independent Expert

How the performance meets the assessment criteria

Delivery

23 Milestones:

- ❑ 21 Completed
- ❑ 1 Partially Completed – Outside of SONI’s Control
- ❑ 1 Not Progressed – Outside of SONI’s Control

SONI delivered over 90% of the milestones under role 2, with the 2 remaining milestones not complete were not delivered in year due to delays **Outside of SONI’s Control**.

We consider that we have **exceeded expectations** within the delivery criterion for role 2. Out of the 23-milestone outlined, we have successfully completed 21, a significant achievement that underscores our commitment to delivering results. This accomplishment demonstrates our ability to manage and drive complex projects to completion, even within a challenging and dynamic environment. It highlights that when projects are within SONI’s direct control, we consistently deliver high-quality outcomes.

This role has the fewest external dependencies, and we successfully delivered all milestones except for the two impacted by external factors. Furthermore, we have gone above and beyond by undertaking additional stakeholder engagement activities not originally included in the Forward Work Plan. These efforts highlight our commitment to maintaining a high standard of delivery across all projects and demonstrate our proactive approach to exceeding expectations.

Stakeholder Engagement/Satisfaction

SONI believe that we have made significant effort this area and, when compared to our position in 2019, we feel we have **exceeded expectations**. The work undertaken in the stakeholder needs assessment in 2023, was pivotal in shaping the development of our stakeholder management strategy, ensuring it was informed by the needs and prioritise of those we serve. Following the finding of the needs assessment, we held a further round of engagement discussions with key partners, including representatives from Renewable NI, the NI Chamber of Commerce and the Consumer Council. In addition, we conducted a public consultation on our approach to the stakeholder engagement strategy, ensuring transparency and inclusivity in our decision-making processes.

Our unique position at the centre of Northern Ireland's electricity system enables us to provide valuable insights through our modelling and analysis, which is shared to enhance and inform stakeholder discussion. For example, the formation of the 80/30 working group by the DfE, attended by key industry stakeholders, has been instrumental in fostering meaningful conversations and driving engagement on the delivery of net zero goals.

Our work on the security of supply publications has also been critical in keeping the industry informed and updated. In preparation for the Winter Outlook Publication, we held several briefings with stakeholders, including NIE Networks, Manufacturing NI, Local Government Association NI and the Business Alliance NI, receiving positive feedback for our proactive engagement. Additionally, we have maintained close communication with DfE and the UR on issues relating to security of supply, ensuring full awareness and understanding of any emerging challenges. Collectively these efforts highlight our proactive approach and SONI's commitment to delivering meaningful and impactful engagement with stakeholders.

Adaptability

We consider that we have **exceeded expectations** in the adaptability criterion. It is important to note that, despite having a relatively small amount of resource available to support certain engagement workstreams on an ongoing basis within our Communications team, the engagement requirements and expectations placed upon SONI have significantly increased since our last price control. To address this, as part of our work on the Stakeholder Engagement Strategy, we established the Stakeholder Engagement Coordination Group, comprising representatives from each team across the business with external engagement responsibilities. This model has been instrumental in building capacity across the business, allowing each team to contribute to the strategy and action plan while also taking responsibility for delivery and ensuring the quality and standards of engagement at working team level. Given that not everyone in SONI has had formal training or exposure to engagement we have prioritised upskilling teams across the business.

For the Enhanced Public Engagement Process for Infrastructure, we recognised the challenge of stakeholder fatigue with industry consultation and proactively organised a workshop to assist organisations that may not have the resources to respond to consultations.

Regarding the All-Island Generation Capacity Statement, part of the security of supply publications, we have had to be adaptable to feedback from the Regulatory Authorities and requests for further information before they will approve the NRAA Methodology. The GCS cannot be published without the approval of the methodology, and we have maintained ongoing contact with the Regulatory Authorities to resolve any outstanding concerns.

For the Price Control process, we have significantly increased our stakeholder engagement and adapted our approach to developing this new price control by ensuring a comprehensive understanding of industry needs. We believe this will enable SONI to make informed decisions while remaining compliant with our regulatory requirements. These efforts demonstrate our ability to adapt to changing circumstances and stakeholder expectations, ensuring we continue to drive effective engagement and meet evolving demands.

Role 3 System Planning

How the performance meets the assessment criteria

Delivery

21 Milestones:

- ❑ 14 Completed
- ❑ 2 Partially Completed – Within SONI’s Control
- ❑ 3 Partially Completed – Outside SONI’s Control
- ❑ 2 Partially Completed – Improved Outcome for Consumers

We believe that we have **met expectations in** the delivery criterion for role 3, despite facing delays throughout the year caused by external dependencies and unforeseen resourcing constraints. Many of the outstanding areas are out our direct control and involve significant challenges, leaving us reliant on external engagement to progress. Legal challenges and ongoing difficulties in securing suitable land at a suitable cost have further impacted the delivery of certain milestones. Nevertheless, we have worked diligently to overcome these obstacles and have made considerable progress. The remaining milestones are nearing completion, and we remain fully committed to delivering them in the near future

Stakeholder Engagement/Satisfaction

We consider that we have **exceeded expectations in** the stakeholder satisfaction criterion for Role 3, reflecting the significant enhancements made to our stakeholder engagement practices since 2019. Through SONI’s Public Engagement model, our dedicated engagement team has successfully delivered a comprehensive package of external engagement and communications. This has ensured that local communities and key stakeholders have had meaningful opportunities to contribute to our plans. Importantly, we actively gather and incorporate feedback from these interactions enabling us to continuously refine and improve our approach to consumer and stakeholder engagement. These efforts demonstrate SONI’s commitment to fostering transparent, inclusive and collaborative relationships for the communities we serve.

For the North -South Interconnector project, we made substantial progress by engaging with 190 impacted landowners, holding ongoing discussions to address their concerns and secure their cooperation. This engagement was further strengthened through support from political stakeholders and community representatives, ensuring a collaborative approach.

For the Energising Belfast project, we worked closely with Translink and NIE Networks to collectively assess the feasibility of advancing ducting through Grand Central Station. This innovative approach aims to expedite the program while delivering cost savings and benefits to local communities by minimising disruption to traffic and pedestrian flow in future years, reducing risks to high-quality public spaces, and addressing complex engineering challenges.

Similarly, for the Eden-Carnmoney project, we engaged extensively with political representatives and local councils. This outreach has been critical in helping local communities understand the importance of the project and its potential benefits for the area. These examples highlight SONI's commitment to fostering meaningful stakeholder relationships and ensuring our projects align with the needs and expectations of those impacted.

Adaptability

We have demonstrated adaptability in this role through various projects included in the Forward Work Plan.

We consider that we have **exceeded expectations** in this role, reflecting the substantial improvements and enhancements we have implemented. A key advancement has been the establishment of a dedicated resource for the Joint Project Management office with NIE Networks. This resource plays a critical role in ensuring that all project timelines are comprehensively assessed, monitored and reviewed, providing a coordinated and structured approach to project delivery. This improvement not only enhances the efficiency and effectiveness of project management but also strengthens our collaboration and alignment with NIE Networks, ensuring that projects are delivered accordingly and meet their objectives.

For the Mid-Tyrone upgrade, a comprehensive review of the project was conducted to ensure its alignment with future requirements, particularly in light of evolving climate change targets and updated renewable energy pipeline data. As part of this review, the team revisited and reappraised the multi-criteria analysis, incorporating the latest information to reassess the project's viability and effectiveness. This rigorous analysis led to the identification of a new preliminary preferred option that better supports long-term sustainability goals. Following this, we updated our stakeholder engagement strategy to reflect the revised project direction, ensuring transparent communication and continued collaboration with all key parties.

For the Mid-Antrim upgrade, we overcame the challenge of engagement with local communities across a wide geographical area by establishing a community forum and citizen sounding board. This initiative allowed us to gather feedback from consumers in all three council areas, ensuring their voices were heard

Role 4 Commercial Interface

How the performance meets the assessment criteria

Delivery

11 Milestones:

- ❑ 7 Completed
- ❑ 4 Not Progressed – Outside of SONI's Control

We have successfully delivered all milestones within our control in this role. However, there are four milestones that were not delivered as planned and these are due to factors **Outside of SONI's control**. Despite our best efforts, external dependencies prevented the timely completion of these specific milestones. We remain focused on addressing these challenges and continue to work towards achieving them as soon as possible.

We therefore consider that we have **met expectations** for this criterion in this role.

Stakeholder Engagement/Satisfaction

We consider that we have **exceeded expectations** regarding this criterion, demonstrated by our proactive response to the significant increase in connection applications and the growing diversity of technology types. These include offshore projects, battery storage, synchronous compensators, and data centres. This evolution has resulted in a substantial rise in pre-application engagement activity, as we work closely with a broad range of customers to address their specific needs and requirements. By fostering collaborative relationships and providing tailored support, we are enabling the efficient progression of applications while ensuring that stakeholder expectations are achieved.

Throughout the Connection offer process, we have maintained ongoing engagement with customers as key stakeholders, as well as NIE Networks. Our interactions with NIE Networks have been particularly focused on addressing complex connection applications, while we have also worked closely with the UR on any required extension requests. The connections team has engaged with NIE Networks in the establishment of the Joint Project Management Office, fostering collaboration and efficiency.

Additionally, the connections team conducted a review of the connections policy and presented it to both DfE and UR ahead of publishing the document for consultation. In relation to Low Carbon Inertia Services, we have consulted twice with industry on the requirements and procurement approach, as well as the contractual arrangements. We have also held webinars to present the content of these consultations ensuring transparency and inclusivity in our process. Our continued collaboration with the UR on this project has been vital, with several workshops held to facilitate progress.

For the LDES project, we have maintained ongoing engagement with the Regulatory Authorities, the DfE and market participants to ensure the project continues to move forward. These engagements have been crucial in addressing challenges and exploring solutions to drive the projects success.

Adaptability

We consider that we have **exceeded expectations** regarding the adaptability criterion for Role 4, particularly in managing the substantial increase in connection applications and offers. Despite the challenges posed by this significant workload, our small and dedicated team has demonstrated exceptional commitment and resilience. To ensure that all timelines for offers were met, team members have gone above and beyond, often working extra hours to maintain the high standards expected of us. This dedication has allowed us to deliver timely and high-quality outcomes for customers, reinforcing our commitment to excellence in this critical area.

In the connections offer process, we have consistently implemented a range of initiatives to improve efficiency. These include:

- ❑ Reviewing and refining controls around the connections queue database and its impact on system studies
- ❑ Standardising system studies by adopting a template approach
- ❑ Building out a project pricing database to streamline delivery and improve consistency
- ❑ Enhanced internal reporting on offer process statistics to assist in the efficient allocation of resources.

These are just a few examples of these initiatives undertaken within the connections team to optimise the connections offer process.

In the Low Carbon Inertia Services project, we quickly adapted by amending the contract template in a very short timeframe before the tendering process began, ensuring we could add a new clause. We engaged swiftly with the successful tenderers within 20 working days, demonstrating our ability to respond effectively under tight deadlines.

For the LDES project, after the call for evidence, SONI reassessed our approach and are continuing to collaborate with DfE and UR to understand how best to move forward. Despite these challenges, we have continued to conduct extensive technical studies, modelling and analysis to assess the impact of LDES and support the development of future programmes.

We believe that by being proactive, we have ensured we remain prepared to process key activities as soon as the necessary direction is given.