

SONI Forward Work Plan

2022 – 23

Appendix 6 Stakeholder Engagement

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Castlereagh House, 12 Manse Road, Belfast BT6 9RT
Telephone: +44 28 9079 4336 • www.soni.ltd.uk

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Stakeholder engagement

SONI Forward Work Plan 2021-2022

Stakeholder engagement is one of the four SONI outcomes and an important criterion by which SONI is assessed as part of the Evaluative Performance Framework.

This appendix sets out SONI's Stakeholder Engagement process in terms of how we engage, why we engage and what we use the stakeholder information for. We will also detail the stakeholder segmentations that we work with through each of the four SONI TSO roles and set out our planned engagement activities for the period October 2022 to September 2023 across each role.

SONI's Response to Stakeholder Feedback

Further to the above, it is also an important factor that we use stakeholder views in order to form our Forward Work Plan.

SONI received feedback during the transition phase of the Evaluative Performance Framework for 2021-22 from:

- The stakeholder submissions¹ provided to, and published by, the UR in their call for stakeholder submissions on the SONI Forward Work Plan 2021-22
- The stakeholder event² which was held on 25 May 2022
- Queries received from the independent panel during their evaluation process
- The panel's publication of their [Evaluative Performance Report](#) published on the UR website on 8 June 2022
- The Utility Regulators determination³ on the assessment of the SONI Forward Work Plan 2021 – 2022

In this document, the section "How Feedback Shaped SONI's Forward Work Plan" collates the feedback received during the 2021-22 phase and highlights the improvements that SONI has made in the 2022-23 Plan to address this.

¹ [Responses to EPF on SONI's Forward Work Plan | Utility Regulator \(uregni.gov.uk\)](#)

² [SONI Evaluative Performance Framework stakeholder responses to SONI FWP and invitation to stakeholder meeting | Utility Regulator \(uregni.gov.uk\)](#)

³ [SONI Evaluative Performance Framework \(EPF\): UR decision on SONI Forward Work Plan \(FWP\) 2021 to 2022. | Utility Regulator \(uregni.gov.uk\)](#)

SONI Stakeholder Engagement

Overview

This section will focus on how SONI engages, why we engage and what we do with the feedback we receive during the engagement process. We also detail the planned engagement for the period October 2022 to September 2023.

Stakeholder engagement is a key area across SONI, in particular in Role 2 Independent Expert and holds its own pillar within our Shaping Our Electricity Future roadmap.

Figure 1 below shows the variety of stakeholders which we engage with.

Figure 1: SONI Stakeholders



Stakeholder Identification & Mapping

SONI's process for mapping and targeting stakeholder cohorts is comprehensive, strategic and based upon best practice methodology. When embarking upon a specific project SONI follows the process identified in Figure 2, below.

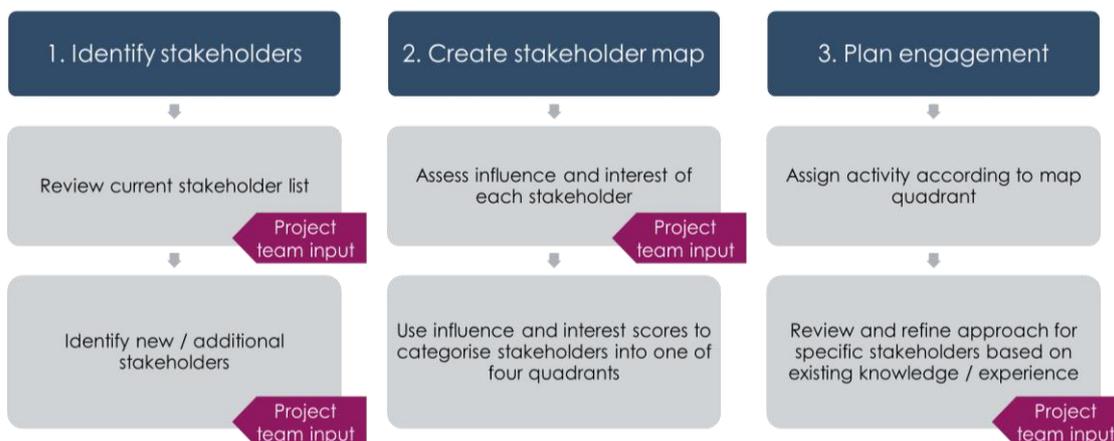


Figure 2: The stages involved in the SONI stakeholder mapping process

The first part is to identify stakeholders; this is anyone who has an interest in the project SONI is undertaking. Cross-functional teams⁴ contribute to this process by considering in turn:

- stakeholders who are logical extensions of those we are already aware of; and
- those who might realistically be engaged if they are aware of the project.

This is an iterative process whereby SONI brings in knowledge from the whole project team to identify the widest possible range of stakeholders. This helps avoid any last-minute issues should a party not considered expresses an interest in the project.

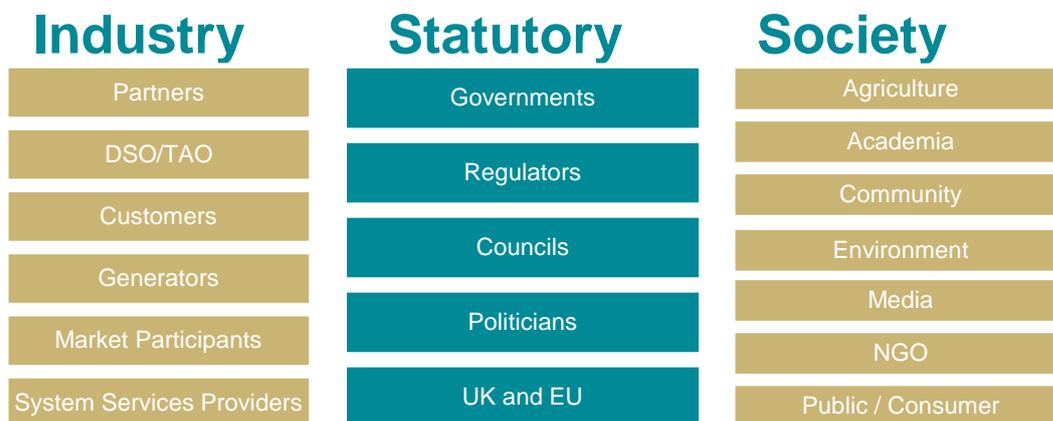
We encourage our teams to think broadly so that we are not stuck on ‘the usual suspects’ and missing new stakeholders or groups.

We utilise a stakeholder mapping spreadsheet to list stakeholders and categorise them according to different criteria.

Stakeholder mapping is not a static activity – new stakeholder groups can emerge at various stages through the project’s lifetime. The stakeholder database per each project is therefore treated as a living document, to be monitored and updated periodically.

Given the significance of stakeholder engagement to the success of future policy target delivery and the potential impact on a wide range of stakeholder cohorts, we target best practice engagement at three key stakeholder categories deemed to be inclusive of the majority of Northern Ireland civic and industrial society; Industry Stakeholders, Statutory Stakeholders and Society Stakeholders. See Figure 3 below.

Figure 3: SONI Stakeholder Segments



Our goal with engagement is to be ambitious and to reach all the segments we set ourselves the task of engaging with. We achieved this goal with Shaping Our Electricity Future and in doing so, set new standards for SONI and take confidence from this.

⁴ Cross-Functional roles involved include project management, engineers, communications team, planners, wayleave engagement team, management and so forth

Why We Engage

SONI believes that truly successful engagement is making informed decisions utilising all available insights. We set out to ensure that those who are affected by activities and plans are afforded the opportunity to have an input into the process and to understand how their contributions have been taken on board, resulting in better outcomes for all. While not everyone will agree with the decisions made, everyone should have an equal chance to have their say, to understand why decisions are made, and to feel that decisions are made in a fair and open way.

As a minimum, a successful approach for SONI:

- ensures stakeholders are aware of engagement activities
- communicates clearly with stakeholders, using plain English summaries of proposals and other relevant documents
- allows enough time for stakeholders to consider the information provided, and to give us their views
- offers clear opportunities to have their say
- explains the decisions needed to be made and the timeline; and
- ensures learnings experienced during initial rounds of engagement are applied to later rounds.

How We Engage

Our key engagement principles ensure that we will listen to all our stakeholders and consider their feedback to ensure better outcomes in our decision making. We want to ensure that our stakeholders will have their say and that we are listening.

Figure 4: SONI Stakeholder Engagement Process



In practice this means that we will:

- involve stakeholders early in the process so they can influence plans
- provide information in plain english that is accessible
- provide enough time for people to contribute their views
- offer clear opportunities for engagement and ways to influence the decision-making process
- explain decisions that need to be taken and factors that influence those decisions; and
- communicate with everyone who has taken the time to engage with us and explain how feedback shaped our eventual decision or approach.

These principles form the basis for all engagement with industry, customers seeking connections, Government, the Utility Regulator, and members of the public.

Over the period, SONI will be making improvements in this area which is demonstrated in our programme of work for the Mid Antrim Upgrade project⁵. This will include a Community Forum and a Citizen Sounding Board. This Community Forum will include a group made up of 15 local stakeholders from the geographical area impacted by the project and will represent the views of their organisation and community in relation to the project and provide guidance on local needs and priorities. The forum is likely to meet every 8 weeks throughout the life of the engagement process.

⁵ Please see Appendix 3: SONI Deliverables 2022 – 2023 Role 3 System Planning, FWP034 Mid Antrim Upgrade, page 14

The Citizen Sounding Board will include a group of approximately 30 residents recruited at random to demographically reflect the population of the areas impacted by the project. Their involvement will address the gap in representation that can result from only hearing from organised civil society and interest group. It will operate as a sounding board for SONI and the Community Forum and provide a broadly representative local response, identify priorities, provide feedback and help develop recommendations that are not already shaped by vested interests. The Citizen Sounding Board would be brought together for at least 3 days during the pre-application stage. This engagement will also include the launch of a virtual consultation meeting room in order to address the requirements of the many different stakeholders related to this project.

Recent Engagements

Shaping Our Electricity Future V1.1

SONI is working on a revised version of Shaping Our Electricity Future which will take into consideration the changes required to meet our revised targets from 70% to 80% renewables by 2030. Engagement will form a key part of this review.

In July 2022, SONI launched a call for inputs which requested submissions from stakeholders and the public on the changes required to our four key pillars, that industry considers is required to meet this revised target. This also included an industry webinar, to provide a forum to debate and deliberate over the key areas which industry considered relevant and SONI will use these engagements to inform the Shaping Our Electricity Future V1.1 publication.

Additional detail around Shaping Our Electricity Future V1.1 and associated engagement activities is provided in Appendix 2: SONI Deliverables Role 2 Independent Expert.

Shaping Our Electricity Future Advisory Council

SONI considers that stakeholder engagement is a key aspect in relation to increasing knowledge dissemination and we are confident that our proposals to continue inclusive, transparent and collaborative engagement with industry are on the right track. One of the ways in which we do this is through our Shaping Our Electricity Future Advisory Council Engagement.

SOEF Advisory Council provisional meeting dates	
1	04 May 2022
2	15 September 2022
3	18 January 2023
4	10 May 2023
5	13 September 2023
<i>Dates may be subject to change</i>	

The Shaping Our Electricity Future Advisory Council, was established in response to feedback we received as part of the Shaping Our Electricity Future consultation. It is acknowledged via direct industry feedback, as a very effective way of tackling complicated issues with subject matter experts (SMEs) from across the island and internationally. We held the first two Shaping Advisory Council meetings and have timetabled subsequent meetings every 4 months for the next 12 months.

Similar to the Advisory Council, we will build on the industry engagement model used for DS3 – which was adjudged to be very effective. SONI is naturally open to other suggestions and will encourage industry to engage with future iterations of the Shaping Our Electricity Roadmap and associated consultations/briefings/fora.

Stakeholder Engagement KPI

Introduction

SONI received a number of comments in relation to the lack of a Stakeholder engagement KPI from May 2022 to June 2022. SONI has fully considered all submissions and considered the actions required in order to implement a measure of performance for stakeholder engagement that is robust and readily evidenced in order to meet our needs and the needs of our stakeholders. This section details our plans for the period in order to be responsive to the feedback we have received in this area.

The need to engage for better outcomes for all is recognised in our strategy and dominates our approach to delivery of it. Our focus is not just at the level of supporting the energy transition, but in engaging, supporting and facilitating the realisation of what change means.

In recent years we have reviewed and transformed our public and stakeholder engagement in relation to transmission grid infrastructure. We have developed a framework for decision making which puts accessible communications, digitalisation, outreach with communities and stakeholders at the heart of our approach, and we are committed to further improvements.

We will also continue to invest our time and resources in a strategic and transparent approach to regulatory engagement. The UR is a principal stakeholder in our new focus on sustainability. We have learned much since undertaking our engagement in relation to the Shaping Our Electricity Future project, which included our most extensive consultation exercise to date. We now need to build on these improvements and to do this we need to fully understand our stakeholders' expectations for engagement.

Stakeholder Needs Assessment⁶

This project will allow the development of a performance measure in relation to SONI's stakeholder engagement outcome. We will look for inputs from stakeholders in order to develop measurements of stakeholder engagement.

In the interim period, SONI will also develop a metric using the number of engagements expected to be carried out throughout the period in order to have a qualitative and quantitative measure of success. This is provided in further detail in Appendix 5: SONI Performance Measures.

⁶ This deliverable is detailed in Appendix 2: SONI Deliverables for Role 2 Independent Expert, page 10

How Stakeholder Views Formed SONI's Forward Work Plan

In preparation of the Forward Work Plan 2022 – 2023, SONI has reviewed and considered the stakeholder submissions provided, and what actions we can take in order to demonstrate improvements in the areas called out in these submissions.

In the sections below, we take each area of feedback in turn and provide the SONI response as to how we have addressed (or intend to address) the feedback provided.

Written feedback was provided on three occasions:

- Stakeholder Submissions⁷ requested by the Utility Regulator on the Forward Work Plan 2021 – 2022 published in May 2022
- The EPF (Evaluative Performance Framework) Panel Report⁸ which was published on the Utility Regulator's website on 8 June 2022, and
- The Utility Regulator's decision⁹ on the SONI Forward Work Plan 2021 – 2022 published on their website on 30 June 2022

Stakeholder Submissions to the 2021-2022 Forward Work Plan and SONI's response

Submissions were provided by stakeholders as detailed above. We take each element of the feedback in turn below to highlight what actions SONI has taken to inform the Forward Work Plan 2022 – 2023.

Service Ambition

Stakeholder feedback indicated targets do not provide historic data on various KPIs.

SONI Response: SONI has prepared a separate Appendix 5: SONI Performance Measures whereby we provide detail on the KPI, the projects which we expect to affect this KPI and the historical data or trends from this KPI in order to provide a clear picture regarding specific performance measures.

UR Service Priority Alignment

Stakeholders provided feedback regarding the plan, in describing how the various roles are aligned with the UR Service Priorities, contains a large amount of aspirational material which is not backed up by practical evidence.

SONI Response: SONI, in our 2022 – 2023 plan, has sought to improve in this area. For each deliverable we have identified our own behaviours¹⁰, provided examples of when these behaviours are exhibited and related these back to the relevant UR Service Priority. In Appendix 5: SONI Performance Measures, the UR Service Priorities are addressed in turn and related back to specific projects within this plan and how these are aligned. In terms of evidence, this is something we consider to be captured in the future publication of the Annual

⁷ [Responses to EPF on SONI's Forward Work Plan | Utility Regulator \(uregni.gov.uk\)](#)

⁸ [EPF Panel Report Final.pdf \(uregni.gov.uk\)](#)

⁹ [Utility Regulator decision on SONI Forward Work Plan \(FWP\) 2021 to 2022 | Utility Regulator \(uregni.gov.uk\)](#)

¹⁰ This is referenced in the "Strategic Theme" text box throughout all 4 SONI TSO detailed deliverables

Performance Report in December 2023, evidencing the achievements over the period and providing more demonstrable evidence. In a forward work plan this is something which is difficult to define should there be additional complexities associated with a project and as such tangible evidence is not something we can provide for every project detailed in the plan, as such activities are yet to be undertaken.

This year will be the first full year of the Evaluative Performance Framework process. SONI expects that the development of the performance report for 2022-23 will include the practical evidence of how SONI delivered against the initiatives included in the Forward Work Plan

Stakeholder Engagement

Feedback received expressed views that the plan was considered to be light on describing how the feedback from stakeholders is utilised and how it shapes what SONI does. While there are 251 references to stakeholders throughout the 2021 – 2022 document, it was considered that these were not categorised in any way, nor was there considered to be any description how engagement is tailored to meet the needs of various stakeholder groupings or how feedback is used to drive improvement.

SONI Response: SONI considers we have made improvements to the Stakeholder Engagement characterised throughout the plan. Taking into considerations learnings from the feedback provided, SONI has adopted to provide this additional document surrounding SONI Stakeholder Engagement. We have provided stakeholder groupings as pertains to each role and the planned engagement activities for the period for those groups. We have laid out why and how we engage and provided information around how we use stakeholder feedback to adapt our plans. SONI considers this to be a step change in the level of information provided as part of the plan in comparison and addresses the stakeholder views raised in feedback.

Service Accountability

Stakeholders considered that throughout the 2021 – 2022 plan there were few numerically based metrics used. Where timely delivery is quoted as a measure, it was considered that little evidence was provided as to how this was to be measured or what the actual target delivery dates are. Stakeholders considered that there was no sense of how project slippage is considered when evaluating delivery against time.

SONI Response: SONI has taken into consideration stakeholder views provided relating to Service Accountability and as such we have introduced additional performance measures. We have detailed all information relating to historical data, targets and the projects which will assist in achieving these targets in Appendix 5: SONI Performance Measures. The SONI Performance Measures document also provides guidance around areas where timely delivery of publications or material is considered a measure of performance, how these dates are treated and what we consider to be successful in this area.

Other areas which stakeholders raised concerns around are detailed as follows:

Transmission Investment Plan (TIP)

NIE Networks responded to the call for stakeholder submissions to suggest that a full and detailed assessment of the deliverability of the TIP, including all planned asset replacement and maintenance work.

SONI Response: SONI has considered NIE Networks suggestion and has captured this further deliverable in our 2022 – 2023 Forward Work Plan¹¹. SONI values NIE Networks feedback and is in agreement that this activity will bring additional transparent communication between the TSO and DSO to ensure a continued safe and reliable network into the future.

Table of Deliverables

NIE Networks advised that it was quite difficult to identify the areas which may be most relevant. The table of deliverables within the Executive Summary could perhaps facilitate this if KPIs were added to each role/deliverable.

SONI Response: SONI has given further thought to NIE Networks feedback. We have been responsive to this by including the performance measure in the table of deliverables in the Executive Summary as well as the form of engagement that will take place as part of the project.

KPIs

1. *NIE Networks provided feedback recommending that to ensure the plan is considered in its entirety they would expect deliverables and KPIs in this area to consider all three aspects of the plan.*
2. *NIE Networks also advised that they consider System Availability and SML are not appropriate measures of a holistic approach to transmission system management and may in fact counteract it. NIE Networks proposed some further indicators:*
 - a. *% outage availability for maintenance plan*
 - b. *% outage availability for asset replacement plan*
 - c. *% outages cancelled*
 - d. *E600s approved within agreed timescales*

SONI Response: SONI welcomes NIE Networks feedback regarding the development of KPIs for Role 3 System Planning. After further consideration we have removed System Availability and System Minute Lost as indicators to the performance of the deliverables contained within Role 3. SONI has decided that given the nature of the activities which are detailed in Role 3, a more appropriate performance measure would be either:

- a. *Timeliness of UR approval for TNPP submissions;*
- b. *Number of projects where a TPI is issued; or*
- c. *Number of projects where a TPA is entered into*

SONI has included the submission of TNPPs to the UR as a performance measure and is considering future KPIs in this area which could be further developed.

Format, Presentation and the Length of the Plan

The Utility Regulator provided feedback under the above heading, detailing that they did not consider the plan to present a coherent, succinct and persuasive narrative, supported by evidence, of how SONI plans to improve performance and what specific behaviours it will exhibit to deliver outcomes. The Utility Regulator also asked that SONI learn from best practice elsewhere.

It was also requested that a greater use of diagrams and graphics to explain key elements of the plan would have allowed complex themes to be more easily represented, and therefore understood by non-technical readers.

¹¹ Please see Appendix 3: SONI Deliverables Role 3 System Planning

Stakeholders also indicated that there were many references to other documents throughout the previous plan. That it would have been helpful to have specific references in these documents stated in the previous plan.

SONI Response: SONI has given the feedback provided full consideration and as such revised the layout of the Forward Work Plan 2022 – 2023. SONI has included several appendix documents to detail the relevant area particular to the audience, as some stakeholders may be more focused on stakeholder activities, or the system planning elements; this will allow a more targeted approach to be taken by stakeholders in relation to the elements of the plan they wish to review. This has also facilitated a reduction in the length of the Forward Work Plan, providing an easier read to the audience as opposed to the 2021 – 2022 Forward Work Plan at circa 250 pages. SONI also considered the Utility Regulator’s comments around evidence and behaviours and therefore we have incorporated the rationale to link performance measures to deliverables and detailed the relevant UR Service Priority which indicates the behaviours SONI will exhibit and explain how.

SONI has also incorporated a greater use of infographics and diagrams throughout the Forward Work Plan and associated Appendix documents in order to aid the reader in their understanding of some more complex, technical areas. SONI has referenced other documents in this plan but has provided specific detail around what is being referenced and included specific page references, to assist in validating the information stated.

Strategy and Deliverables

The Utility Regulator submitted that they often found it difficult to understand how an activity contributes to benefits and outcomes as statements were general. The Utility Regulator also raised concerns that they considered SONI had not clearly set out what activity or actions it is going to take to positively affect system wide costs.

SONI Response: In preparation of the Forward Work Plan 2022 – 2023, SONI considered the feedback and the changes that would be required to meet the needs addressed in the submissions. SONI has prepared this Forward Work Plan with the mindset that benefits and outcomes need to be clear, and provide the rationale as to why these arise. SONI has attempted to meet this request throughout all four deliverables appendices. SONI has also been responsive to the Utility Regulator’s comments surrounding system-wide costs in the Forward Work Plan 2022 – 2023. This is a significant change from the last year’s plan.

Performance Commitments and Performance Information

The Utility Regulator advised they found it difficult to understand the full impact that deliverables have on performance commitments and measures, outcomes and how they flow through to consumer benefits. They have provided comments to challenge SONI to justify its performance commitment and information surrounding ambition and also the relevance and focus of certain aspects.

SONI Response: SONI has given further consideration to the Utility Regulator’s submission and has attempted to further clarify in the 2022 – 2023 plan the linkage between deliverable, measures of performance, and how they flow through to consumer benefits. The outcome has been detailed for all deliverables at the end of each table detailing the associated deliverable, but this is an SONI considers that we will expand upon in the December 2023 publication of our Annual Performance Report, when we review the activities over the year and can provide evidence of the benefits these activities will bring to stakeholders and the NI consumer.

Stakeholder Engagement and Collaboration

The Utility Regulator's submission indicated that they found it difficult to understand, with precision, how the plan as a whole has been shaped by stakeholder feedback. The Utility Regulator also advised that SONI intends to undertake increased engagement and continuous engagement, and so they will be interested in understanding how this clearly shapes future plans and how it can demonstrate SONI has taken account of the detailed and diverse needs of stakeholders.

The Utility Regulator also remain concerned as to whether opportunities to collaborate will be availed of, particularly across Role 1 and Role 3. We seek more understanding of how SONI is going to demonstrate a detailed understanding of the different needs of a diverse range of customers and collaborate with (and potentially co-design or trial) with experts and customers, across aspects of its role which can genuinely bring the most benefits to consumers.

SONI Response: SONI considers that the introduction of this Appendix, specifically detailing the relevant information concerning stakeholder engagement and in particular this section, Stakeholder Submissions to the 2021 – 2022 Forward Work Plan demonstrates to some degree how the plan has been shaped by stakeholder feedback. SONI has also made attempts where possible to detail how stakeholder feedback has influenced the direction of projects, whilst trying to maintain a readable and presentable plan for the year ahead.

We have detailed the relevant “stakeholders” for each role within this document and provided our planned engagement activities over the period covered in this plan. Given the mapping of stakeholders provided in relation to each SONI TSO Role earlier in this Appendix, this provides additional clarity to the engagement activities which are detailed in each of the appendix documents further detailing SONI’s deliverables to include engagement activities across the four SONI TSO Roles.

Deliverables

The Utility Regulator advises it may be helpful to provide more definition and specificity for certain steps to demonstrate accountability, with a timetable for future steps considered helpful. Regarding System Services Future Arrangements and the Qualification Trial Process, the Utility Regulator considered these lacked definition and specification.

SONI Response: SONI has considered the feedback provided and in this Forward Work Plan has taken steps to include (where possible and/or appropriate) a visual timetable to demonstrate future work or pathways to progression of certain projects. Future Arrangements System Services is a significant project with many challenges and complexities¹². The Qualification Trial Process¹³ also paves the way for the implementation of the FASS project. These are both significant projects and have been fully detailed in SONI’s Forward Work Plan. SONI was unable to provide detail surrounding the FASS project in our last plan as a condition of the Evaluative Performance Framework is that SONI can only detail projects which have either secured funding or that SONI is willing to progress at financial risk. This is why the detail was considered as lacking in the 2021-2022 plan. However, as SONI has secured funding for Phase 1 of the FASS project, it plays a pivotal role in enabling a transition to our 80% targets and therefore we have provided the specific details (which are dependent on SEMC decisions and/or consultations) for stakeholders. We have attempted to include future plans where appropriate, whilst bearing in mind that we are bound by the UR’s Guidance document to exclude projects where funding is not secured.

¹² For more detail please refer to pages 6 to 10, Appendix 1: SONI Deliverables for Role 1 System Operation and Adequacy

¹³ For more detail please refer to pages 32 to 35, Appendix 1: SONI Deliverables for Role 1 System Operation and Adequacy

Performance Commitments

The Utility Regulator's submission indicates that some performance measures (with exception to SNSP and System Frequency) were found to have no clear linkage provided between the metric/measure itself and the project which is expected to impact on the measure of performance.

The Utility Regulator also indicated they considered there to be a lack of prominence or specificity as to how SONI was going to capture its performance which may be relevant to system wide costs under role 1. They also note that our potential for a cyber security metric appears to have been dropped and indicated that it may be helpful to review the appropriateness of metrics set by OfGem with National Grid.

SONI Response: In each Appendix document which details SONI deliverables across roles 1 to 4, SONI has called out the performance measure to each deliverable. In Appendix 5: SONI Performance Measures, we provide further information for each measure of SONI's performance. These sections provide detail on which project is expected to impact the metric and how/why we anticipate this. SONI has given additional consideration around the system wide costs and the projects which will impact these.

SONI considered cyber security as a confidential area and therefore does not intend to include a narrative or metrics in the SONI forward work plans.