

SONI Forward Work Plan

2022 – 23

Appendix 7 SONI Self-Assessment

Published September 2022



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

Contents

Section 1 Introduction	3
Self-Assessment	5
Role 1 Independent Expert	6
Role 2 Independent Expert	8
Role 3 System Planning.....	9
Role 4 Commercial Interface.....	10

Section 1 Introduction

Overview of the Evaluative Performance Framework Process

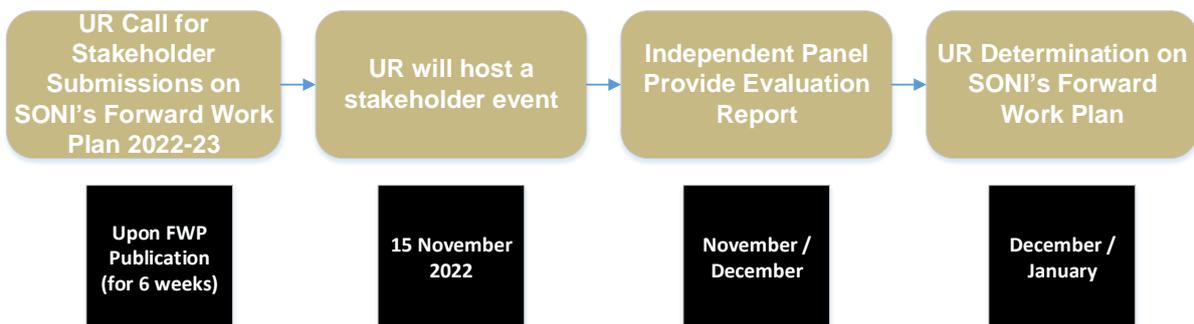
The Evaluative Performance Framework was introduced by the Utility Regulator (UR) in order to provide SONI with a performance incentive mechanism as part of the 2020-25 Price Control Final Determination.

This year is the first year whereby a financial incentive is applicable to SONI for its Forward Work Plan and Annual Performance Report.

This process is summarised the figure below.



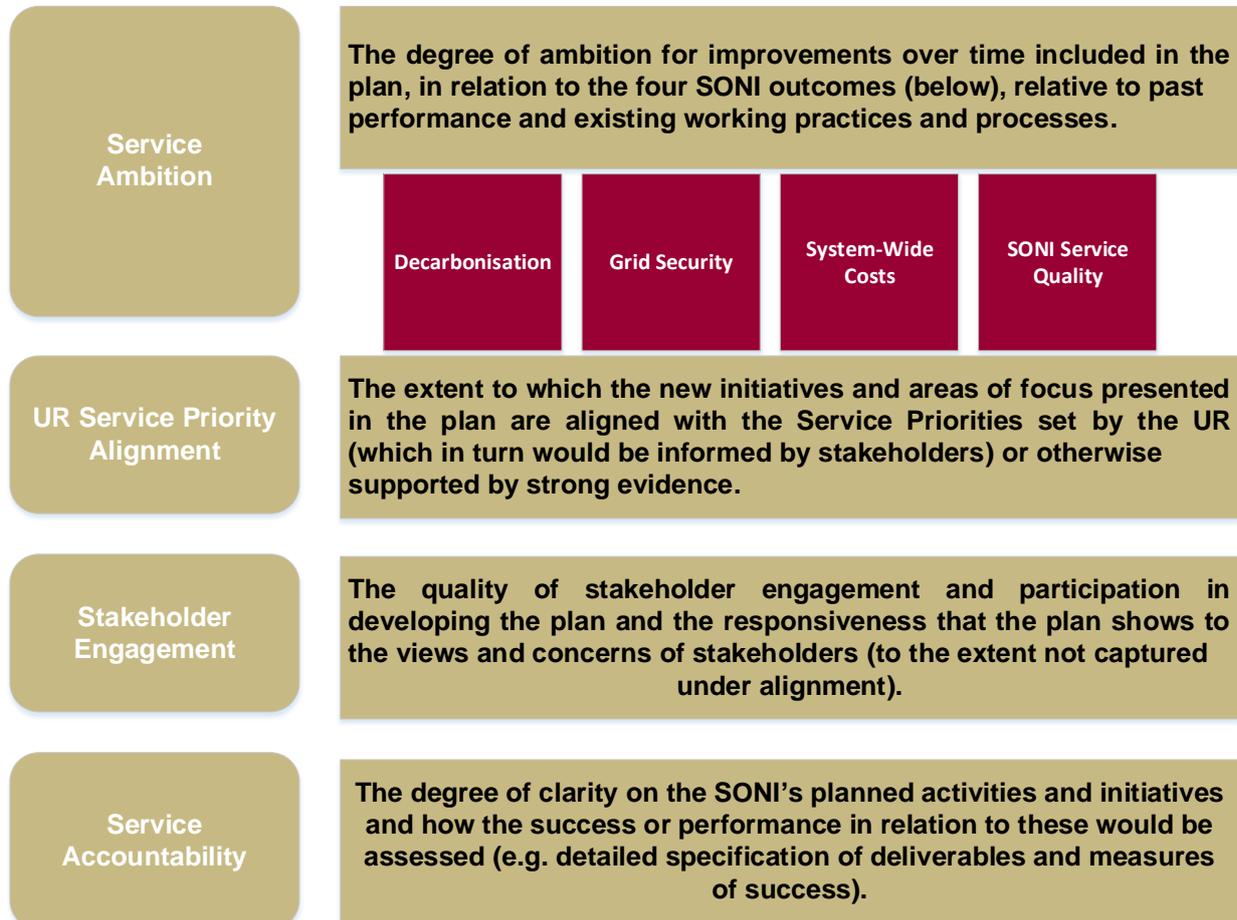
This publication completes the first step in the process above. The UR will request stakeholder submissions on SONI's publication in order to provide feedback from all stakeholder segments to the Independent Panel in order to assist the panel with their evaluation. The additional phases of work in the assessment of SONI's Forward Work Plan are detailed the figure below. Please also note there will be a stakeholder event scheduled following the call for submissions closure, to provide a forum for SONI to present on the Forward Work Plan and take questions and comments from stakeholders.



Assessment Criteria

SONI are assessed by the Independent Panel using the UR's [Evaluative Performance Framework Guidance](#) document (see Chapter 4, pages 17-23 of the UR's Evaluative Performance Framework Guidance).

The Forward Work Plan will be assessed on the following:



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 2022-2023 in the table below.

Table 1: SONI Self-Assessment against Forward Work Plan 2022-2023

		Role 1 System Operation and Adequacy	Role 2 Independent Expert	Role 3 System Planning	Role 4 Commercial Interface
Weights		27.5	25	25	22.5
Criterion	Criterion	Score	Score	Score	Score
1	Service Ambition*	1	0	0	1
2	UR Service Priority Alignment	0	0	0	0
3	Stakeholder Satisfaction	1	0	1	0
4	Service Accountability	0	0	0	0
Assessment Total		2	0	1	1
Assessment Grade		5	3	4	4
Overall Grade	Forward Plan	4.025			
*Service Ambition score is worth double the weight of the other three criterion					

Role 1 Independent Expert

How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	<p>Our plan for the period includes a number of complex and challenging programmes of work, such as FWP23-01 Future Arrangements System Services (FASS). The existing system services arrangements (DS3) were designed to meet the 2020 renewable targets of 40% RES-E and will not be sufficient to deliver the needed capability to achieve the Northern Ireland target of 80% renewable generation by 2030. Attracting investment and procuring sufficient volumes of system services capability from both existing service providers and new prospective providers, will be critical to meeting the 80% target. It is important that the design for the future arrangements is agreed as soon as possible to ensure that appropriate arrangements can be implemented to further ensure that there is no break in the investment that is needed to meet 2030 targets.</p> <p>There is an increased level of complexity in the work scheduled as part of our 2022 – 2023 Plan given the recent change in the NI Climate Bill from 70% to 80% by 2030, alongside the operation of the Transmission System at 75% SNSP and the minimising of constraint groups as part of our programmes of work (FWP008 Minimum Sets for instance). SONI achieved operational policy of 75% SNSP during early 2022.</p> <p>As set out in SONI's operational policy roadmap, the key operational policy change targeted for the coming year is a reduction in the all-island Minimum Number of Conventional Units constraint from 8 to 7.</p> <p>Further increases to the SNSP limit will require enhanced capabilities including system services provision to be incentivised through implementation of the Future Arrangements for System Services programme. The focus now in terms of SNSP is on planning and preparations to increase this target but for 2022 – 2023 we plan to maintain operation of the Transmission System in a safe, secure and reliable manner at this 75% level. We consider this brings added emphasis to our level of ambition in Role 1 System Operations.</p> <p>As such SONI assesses that it exceeds expectation in terms of service ambition.</p>
UR Service Priority Alignment	<p>SONI has reviewed the feedback received as part of the previous assessment. SONI considers that it has added an additional level of clarity around one or more service priority being aligned to each programme of work, and the evidence to detail this. Therefore, it is assessed that the 2022 – 2023 Plan meets expectations for this criterion.</p>
Stakeholder Engagement	<p>SONI has provided the associated engagement activities for each individual programme of work and the processes we will use throughout these engagement activities.</p>

	<p>SONI has also gone a step further with the introduction of Appendix 6: SONI Stakeholder Engagement which details how we engage, why we engage and how we use engagement and the information we receive from stakeholders as part of these activities.</p> <p>SONI has planned for increased engagement from the activities we will be involved in, with FASS to the TSO Demand Side Strategy (FWP23-05) and engagement following on from the publication, alongside our engagement associated with the Capacity Auction Process (FWP004) and Scheduling and Dispatch (FWP23-02).</p> <p>SONI has assessed that the 2022 – 2023 Plan exceeds expectations for this criterion.</p>
<p>Service Accountability</p>	<p>SONI has added a step change by introducing Appendix 5: SONI Performance Measures, which provides historical data (where appropriate) for each KPI and our targets for the year. It also provides a level of clarity around the measure of what we consider as timely publication or what successful delivery is, for a project where that is the associated performance measure. SONI also includes a programme of work for the year, FWP23-10 Imperfection Costs, which will be developed over the year and is expected to contribute to the System-Wide Costs outcome.</p> <p>As a result, SONI has assessed the 2022 – 2023 Plan and considers that it meets expectations for this criterion.</p>

Role 2 Independent Expert

How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	<p>SONI has reviewed the plan of work for 2022 – 2023 and considered this against the feedback provided as part of the previous assessment. We consider that there are a number of activities that are ambitious in terms of supporting the NI Energy Strategy as this work is at an early stage, primarily focused around the consultations and working groups with the DfE, as well as the Data and Digitalisation work we are engaging on with NIE Networks.</p> <p>As a result of these considerations, SONI has assessed that the 2022 – 2023 Plan meets expectations in terms of Service Ambition, such that the activities planned closely align to those that would be expected of this role.</p>
UR Service Priority Alignment	<p>The 2022–2023 Plan, continues the transparent approach to highlighting one or more of the UR service priorities for each programme of work and provides the evidence as to why this linkage is considered appropriate. With that in mind, SONI considers it meets expectations for this criterion.</p>
Stakeholder Engagement	<p>SONI reviewed the 2022 – 2023 Plan, measured the Plan against this feedback and consider that we have provided a step up in the clarity around stakeholder engagement activities associated with each programme of work. We have added the detail of how we will engage for each role and provided further transparency around what we do with stakeholder feedback in Appendix 6: SONI Stakeholder Engagement.</p> <p>SONI will also be holding a number of Shaping Our Electricity Future Advisory Council Meetings (FWP018) over the period which also provides updates on the progress of the pillars which form our Shaping Our Electricity Future Roadmap. The Appendix 2: SONI Deliverables for Role 2 for the period provides an engagement roadmap, as well as the additional engagement that will take place as part of the Stakeholder Needs Assessment (FWP23-12).</p> <p>Therefore, SONI assesses that it meets expectations against this criterion.</p>
Service Accountability	<p>SONI will develop a stakeholder needs assessment (FWP23-12) which provides another method for SONI to assess our performance. We have added clarity around each programme of work, how we will measure our performance, alongside the introduction of Appendix 5: SONI Performance Measures 2022 – 2023 which provides clarity around each measure, for instance the timely publication of materials.</p> <p>In our assessment, we consider the Plan meets expectations for this criterion.</p>

Role 3 System Planning

How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	SONI will be performing a large number of system planning activities over the period, some of which are more heavily tasked than others. SONI has performed the self-assessment for the period with consideration around the feedback received from the Panel and the UR and considers that we also meet expectations for the 2022 – 2023 Plan.
UR Service Priority Alignment	The 2022-23 Plan has taken the learnings from the feedback provided and SONI has made direct linkages for every project to one or more UR service priorities in order to provide more clarity around these strategic themes. As a result, SONI considers that it meets expectations in terms of UR service priority alignment, as this role has demonstrated a step change in presenting the clear linkages between each programme of work and the UR service priority to which it is aligned against.
Stakeholder Engagement	<p>SONI has increased the transparency and clarity of the stakeholder engagement activities which take part in our three-part grid development process and have ensured that the engagement activities are detailed for each programme of work within Role 3.</p> <p>We have gone a step further in our 2022 – 2023 Plan with the introduction of our virtual consultations and virtual meeting rooms (for instance, as demonstrated in FWP034 Mid Antrim Upgrade). The project’s consultation will launch and be promoted by a press release to encourage stakeholder participation. There will also be an additional Community Forum and Citizen Sounding Board. We have detailed associated estimated timelines and our expectations of the engagement, along with the additional Appendix 6: SONI Stakeholder Engagement, which details how we use the information gathered from engagement activities.</p> <p>We therefore consider that presenting the clear engagement activities throughout each programme would meet expectations, and the enhancements to the ways that we will engage, as evidenced in Role 3, bring this up another level to exceeds expectations.</p>
Service Accountability	<p>SONI has assessed our Plan against the feedback from this area. SONI is introducing an additional performance measure in this role around the approval of Transmission Network Pre-Construction Project Submissions, in order to consider the quality and quantity aspects of our performance for those areas.</p> <p>In considering this, SONI has assessed that the 2022 - 2023 Plan meets expectations in this area, as every programme of work has a level of accountability incorporated into it that we can demonstrate as part of the Performance Report in December 2023.</p>

Role 4 Commercial Interface

How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
<p>Service Ambition</p>	<p>As part of the 2021-22 Forward Work Plan, SONI delivered the energisation of two projects, the energisation of the Agivey Cluster and the two battery projects in which we met expectations for service ambition. This is similar to the Connection of Customer Projects deliverable (FWP23-27) in the 2022 – 2023 Plan.</p> <p>SONI considers we are going further this year by planning an updated Transmission Connection Charging Methodology Statement (FWP23-29) as well as the work in the Commercial Arrangements for Low Carbon Inertia (FWP001). The work surrounding Low Carbon Inertia contains a substantial amount of stakeholder engagement, as there are two periods of consultation and associated follow on activities once feedback is received, planned for two consecutive periods of the year.</p> <p>These programmes will require extensive consideration around the views of respondents, what is required as a result of the stakeholder needs identified and further engagement with the Utility Regulator. These policy reviews are a significant undertaking and the timeline we have set (see Appendix 4) is a challenging one when also considering the increased volume of customer enquires being received by the Connections Team.</p> <p>The Connection of Customer Projects also requires a high-level of planning and coordination between SONI, NIE Networks and the developer to ensure that the delivery timeline is aligned, that the safety of our people is recognised during the energisation process and that we are aware of any challenges being faced by NIE Networks or the project developer that are under mitigating actions so we can be responsive to those needs.</p> <p>As a result of the deliverables planned within this role, SONI considers we exceed expectations in terms of Service Ambition for the 2022-2023 Forward Work Plan.</p>
<p>UR Service Priority Alignment</p>	<p>In Appendix 4: SONI Deliverables for Role 4, we have identified the strategic theme behind each project and aligned these to the UR Service Priorities and provided evidence to substantiate these linkages.</p> <p>As a result of feedback to the 2021-22 Forward Work Plan, we have provided this additional transparency and evidence around our views for UR service priority alignment. We have reviewed each individual programme of work for the year and provided linkages from these to the UR Service Priorities and the rationale as to how these are linked to these priorities.</p> <p>Given the linkages provided in these sections and the level of detail to explain how we arrived at these conclusions, SONI would consider that it meets expectations around the UR Service Priority Alignment for this role.</p>

<p>Stakeholder Engagement</p>	<p>As a result of the additional deliverables in this role, SONI will be exercising additional external engagement in order to deliver an updated Transmission Connection Charging Methodology Statement, and to carry out the associated consultations and follow on activities for Low Carbon Inertia, as detailed in the engagement section for each deliverable.</p> <p>SONI has also introduced more detail around stakeholder engagement in Appendix 6. This explains how we engage, why we engage and what we do once the engagement activity has concluded. This is also relevant to the activities which concern consultations in Role 4.</p> <p>Given this step up in stakeholder engagement within this role, required in order to drive change and act as an enabler to the Energy Strategy Path to Net Zero, SONI considers that we exceed expectations regarding stakeholder engagement for the planned deliverables for 2022-2023.</p>
<p>Service Accountability</p>	<p>SONI has considered this feedback and introduced new measures of success for this role.</p> <p>As well as the monthly reporting to the Utility Regulator where we engage on specific project updates, we continue to monitor our connection offer process timeframes and ensure that these achieve the 100% target each month.</p> <p>We will consider the development of a performance measure regarding the number of connection project energisations (annually) which has been set at 2 for 2022-2023 and as detailed in Role 4 Commercial Interface (see pages 5 to 6, Appendix 4). We are unable to include this at present as currently this metric is not wholly under SONI's control as we rely on coordination of activities and collaboration with NIE Networks and the project developer, and therefore it will be consideration over the period.</p> <p>SONI has introduced additional transparency in Appendix 5: SONI Performance Measures in terms of service accountability. Where possible, performance measures will be provided with the target versus actual figures in the Annual Performance Report for 2022-2023 expected to be published in December 2023.</p> <p>As a result of the above, SONI considers that for this Plan, in relation to Service Accountability, we exceed expectations for this role.</p>