

# SONI Forward Work Plan

**2023 – 24**

## **Appendix 7 SONI Self-Assessment**

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# 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 the figure below.

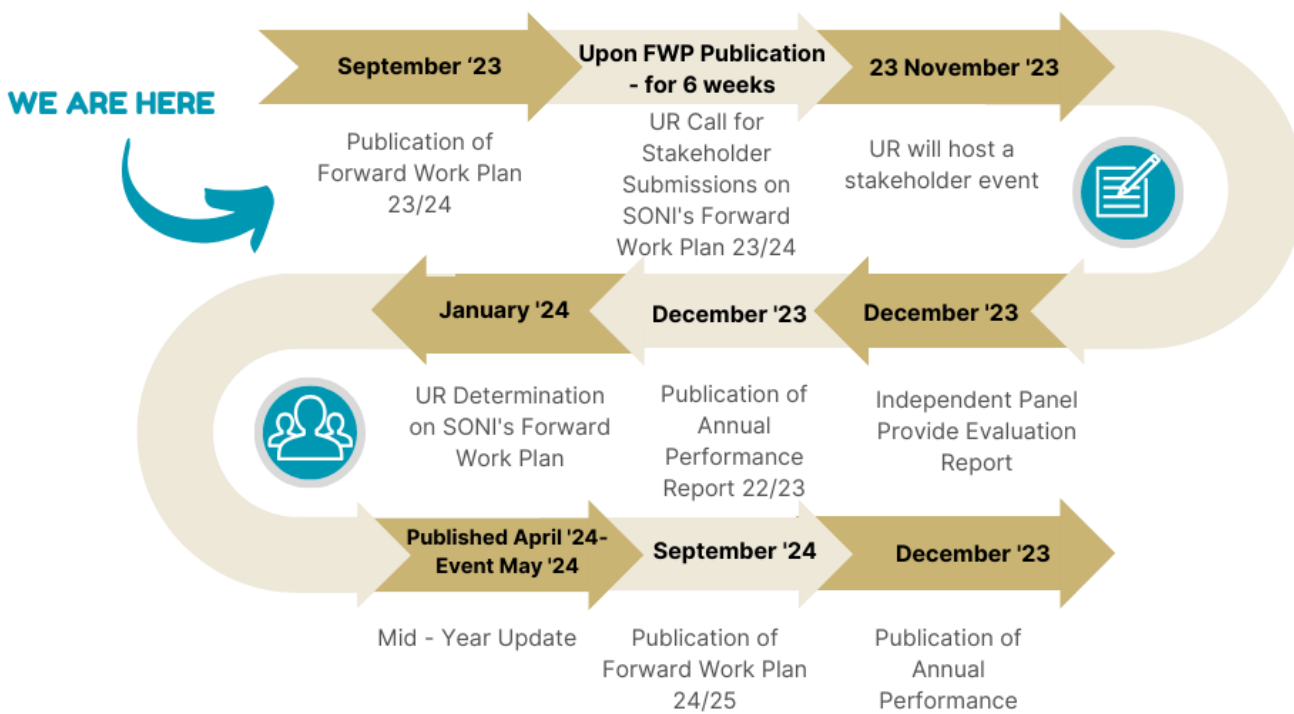


Figure 1 Overview of the Evaluative Performance Framework

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.

Please also note there is a stakeholder event scheduled for 23<sup>rd</sup> November 2023, 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:

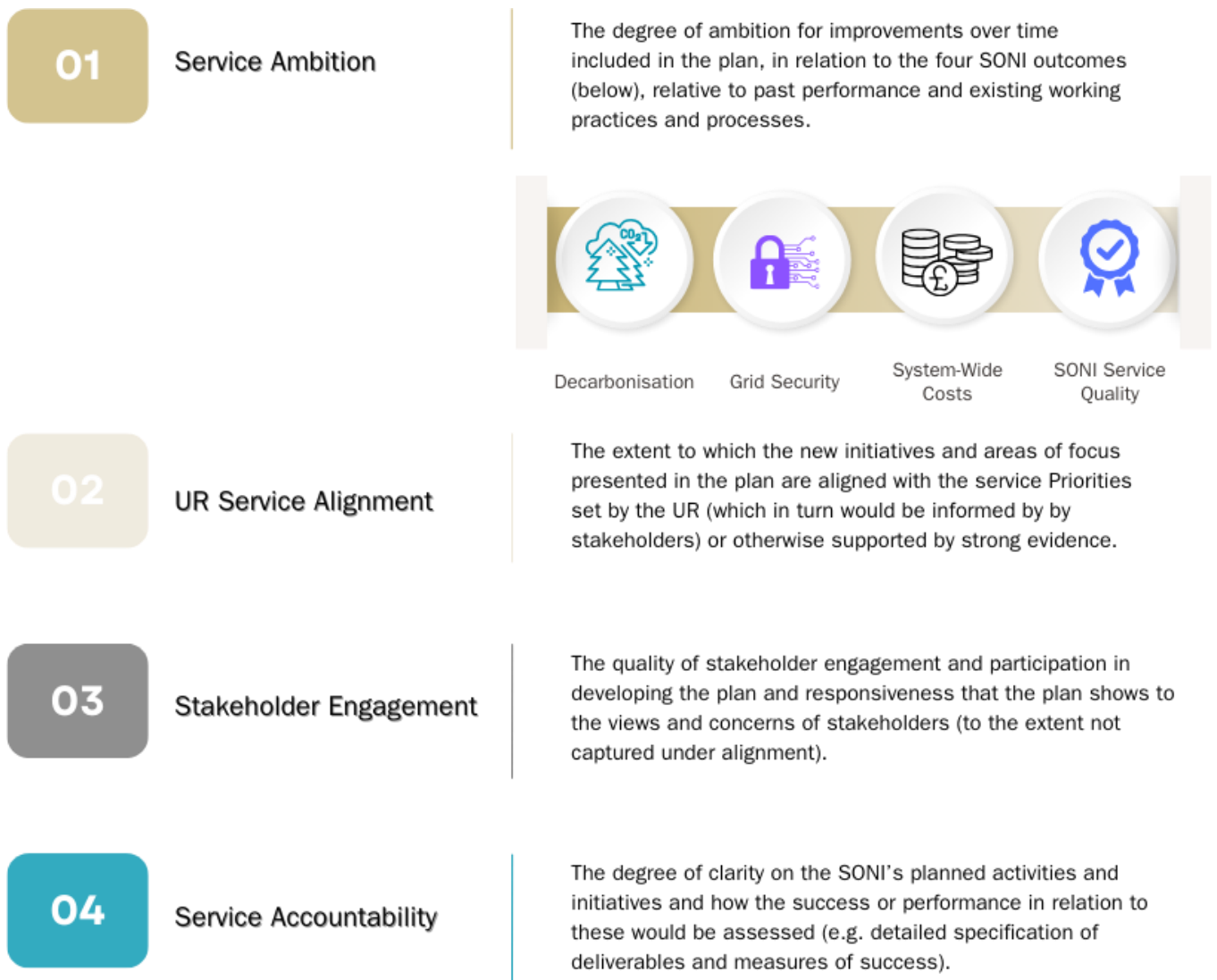


Figure 2 Forward Work Plan Assessment Criteria

# 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.

Table 1 SONI Self-Assessment against Forward Work Plan 2023-2024

		Role 1 System Operation and Adequacy 27.5	Role 2 Independent Expert 25	Role 3 System Planning 25	Role 4 Commercial Interface 22.5
Weights	Criterion	Score	Score	Score	Score
1	Service Ambition*	1	1	1	1
2	UR Service Priority Alignment	0	0	0	0
3	Stakeholder Satisfaction	1	1	1	0
4	Service Accountability	0	0	0	0
<b>Assessment Total</b>		<b>3</b>	<b>3</b>	<b>3</b>	<b>2</b>
<b>Assessment Grade</b>		<b>5</b>	<b>5</b>	<b>5</b>	<b>4</b>
<b>Overall Grade</b>	<b>Forward Plan</b>	<b>4.775</b>			
*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.</p> <p>As set out in SONI’s operational policy roadmap<sup>1</sup>, SONI will complete the ongoing operational trial for a minimum of 7 large synchronous units online, which is part of the transition to system operation with 3 large conventional units or less</p> <p>The Generation Capacity Statement Methodology Statement outlines the expected electricity demand and the level of generation capacity that will be required on the island over the next ten years. A project has been initiated to improve the GCS methodology in order to meet the needs of the Island of Ireland while aligning with the National Resource Adequacy Assessment (NRAA) process (legal requirement<sup>2</sup>). Over the period SONI will be reviewing our modelling systems to transition to Plexos and ensure that our methodology is aligned with the NRAA process. Moving to a new adequacy assessment methodology will enable us to enhance our modelling of a power system with at least 80% renewables. Having already developed a high-level plan on what is required to deliver a new resource adequacy and a high-level design for the modelling framework and a project migration implementation plan, SONI, in collaboration with Eirgrid, will publish the first Northern Ireland NRAA in 2024.</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, for 2023 – 2024 we plan to increase the SNSP limit from 75% to 80%. We consider this brings added emphasis to our level of ambition in Role 1 System Operations.</p> <p>As such SONI assesses that it <b>exceeds expectation</b> in terms of service ambition.</p>
UR Service Priority Alignment	<p>SONI has reviewed the feedback received as part of the previous assessments. 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.</p>

<sup>1</sup> <https://www.soni.ltd.uk/media/documents/Operational-Policy-Roadmap-2023-to-2030.pdf>

<sup>2</sup> Regulation (EU) 2019/943 Article 24

	<p>Therefore, it is assessed that the 2023 – 2024 Plan <b>meets expectations</b> for this criterion.</p>
<p>Stakeholder Engagement</p>	<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 detailed in 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, via the SOEF Advisory Council, and the developments of FASS (FWP23-01), alongside our engagement associated with the Capacity Auction Process (FWP004) and Scheduling and Dispatch (FWP23-02).</p> <p>SONI has assessed that the 2023 – 2024 Plan <b>exceeds expectations</b> for this criterion.</p>
<p>Service Accountability</p>	<p>SONI has provided historical data (where appropriate) for each KPI and our targets for the year in Appendix 5: SONI Performance Measures. 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.</p> <p>In addition, SONI have introduced a Cost Scale in order to provide clarity on the SONI’s planned activities and assist the audience in understanding the scale and/or importance of a project.</p> <p>As a result, SONI has assessed the 2023 – 2024 Plan and considers that it <b>meets expectations</b> for this criterion.</p>

# Role 2 Independent Expert

## How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	<p>SONI considers that there are a number of activities that are ambitious in terms of supporting the NI Energy Strategy (FWP23-14) via providing our independent expert advice to the planned consultations and working groups established by the DfE. We consider we are a trusted advisor on the energy strategy. In addition, we have been and will continue to support DAERA in its development of carbon budgets and the climate action plan.</p> <p>One key strategic area in support of the NI Energy Strategy is in relation to Offshore. SONI has representation and active participation on both Offshore steering group and working groups established by DfE. SONI envisages the work we are undertaking in Tomorrows Energy Scenarios NI (FWP24-05) will act as a key input to the Offshore Renewable Energy Action Plan.</p> <p>Tomorrow’s Energy Scenarios 2023 will outline a range of credible pathways for Northern Ireland’s clean energy transition, with specific focus on what this means for the electricity transmission system from 2030 to 2050.</p> <p>TESNI must be done in a way that tends towards our decarbonisation goals for Northern Ireland (informed by the sixth Carbon budget and the Climate Act 2022). Following significant changes in energy and climate policy, we have adopted a new approach for TES 2023 scenarios and analysis. Scenarios represent various approaches and speed of decarbonisation.</p> <p>As a result of these considerations, SONI has assessed that the 2023 – 2024 Plan <b>exceeds expectations</b> in terms of Service Ambition.</p>
UR Service Priority Alignment	<p>The 2023–2024 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.</p> <p>Tomorrows Energy Scenarios NI is an important strategic project that SONI envisages will assist Government departments and policy makers in the collective effort to meet the targets set for decarbonisation. We expect a wide range of stakeholders to be involved in the consultation process.</p> <p>With this in mind, SONI considers it <b>meets expectations</b> for this criterion.</p>
Stakeholder Engagement	<p>SONI reviewed the 2023 – 2024 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.</p> <p>SONI will continue in holding a number of Shaping Our Electricity Future Advisory Council Meetings over the period which also provides updates on the progress of the pillars which form our Shaping Our Electricity Future Roadmap.</p> <p>SONI has planned for high quality stakeholder engagement for TESNI, during the consultation engagement will be undertaken with government, industry</p>



	<p>and academic stakeholders and briefings will be offered to target stakeholder groups.</p> <p>Following the completion of the Stakeholder Needs Assessment in 2023/24, this project will develop a SONI Stakeholder Management Strategy (FWP24-02) and evaluation, using the research and insights provided by key stakeholders.</p> <p>This will ensure a consistency in SONI’s approach to engagement and ensure our stakeholders know and understand what they can expect from our organisation.</p> <p>SONI will also be undertaking further research to ensure our public engagement is informed by best practice and to aid in delivery of the Review and Publish an Enhanced Public Engagement Process for Network Infrastructure (FWP24-03).</p> <p>Therefore, SONI assesses that it <b>exceeds expectations</b> against this criterion.</p>
Service Accountability	<p>SONI will develop a Stakeholder Management Strategy which will provide stakeholders with a high degree of clarity on the SONI’s planned activities and initiatives and will support SONI to demonstrate its delivery and effectiveness in its stakeholder engagement programme.</p> <p>Key stakeholders will have a clearer understanding on what they can expect from their engagement with SONI and SONI’s engagement will be more structured, consistent, relevant, audience-driven, and responsive.</p> <p>In our assessment, we consider the Plan <b>meets expectations</b> for this criterion.</p>

# Role 3 System Planning

## How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	<p>SONI will be performing significant system planning activities. We consider that the projects being progressed are key for enabling the delivery of the 80% targets. The key strategic projects being progressed in this period include:</p> <ul style="list-style-type: none"> <li>• FWP026: North South 400kV Interconnector</li> <li>• FWP034: Mid Antrim Upgrade</li> <li>• FWP027: Energising Belfast: Castlereagh – Hannahstown</li> </ul> <p>SONI considers that the strategic nature and scale of these projects <b>exceeds expectations</b> for the 2023 – 2024 Plan.</p>
UR Service Priority Alignment	<p>The 2023–2024 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.</p> <p>As a result, SONI considers that it <b>meets expectations</b> 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.</p>
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>Following the completion of the Stakeholder Needs Assessment in 2023/24, this project will develop a SONI Stakeholder Management Strategy (FWP24-02) and evaluation, using the research and insights provided by key stakeholders.</p> <p>This will ensure a consistency in SONI’s approach to engagement and ensure our stakeholders know and understand what they can expect from our organisation.</p> <p>SONI will also be undertaking further research to ensure our public engagement is informed by best practice and to aid in delivery of the Review and Publish an Enhanced Public Engagement Process for Network Infrastructure (FWP24-03).</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 <b>exceeds expectations</b>.</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>

In considering this, SONI has assessed that the 2023–2024 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.

# Role 4 Commercial Interface

## How the plan meets the assessment Criteria

Assessment Criteria	SONI Actions
Service Ambition	<p>SONI considers that two of the initiatives we are progressing (LCIS &amp; Long Duration Energy Storage) demonstrates the scale of ambition we are considering and the proactive approach we have adopted to progress the decarbonization agenda.</p> <p>New sources of low carbon system services are needed for a secure transition to 2030. This new capability will be significantly less carbon intensive than the legacy plant it replaces. A balanced portfolio of batteries, demand side, interconnection, and renewable gas ready conventional capacity (amongst other service providers) will be required to meet our needs.</p> <p>The Low Carbon Inertia Services project is a key part in awarding contracts which will facilitate a low carbon future. SONI is being proactive in our engagement surrounding the procurement of, and contractual approach, to LCIS. SONI considers this demonstrates our agility and responsiveness to changing policy and market development through competition and engagement activities with stakeholders. This programme will ensure that we are able to operate a secure, safe, and reliable transmission system by ensuring that all forms of low carbon generation can be procured. This will ensure all renewable sources of generation can play an important role and facilitate security of supply, therefore bringing benefits to the SONI Grid Security outcome.</p> <p>The Long Duration Energy Storage project is a key part of the balanced power system portfolio of different technologies that is critical in being able to maintain power system reliability while meeting the 2030 renewables targets. We expect that the consultation we have planned will help deliver benefits including:</p> <ul style="list-style-type: none"> <li>• Facilitation of additional RES on the system</li> <li>• Reduction in carbon usage</li> <li>• Overall production cost reduction</li> <li>• Reduction in dispatch down and associated costs</li> </ul> <p>Storage solutions is a key element of the future energy system</p> <p>As a result of the deliverables planned within this role, SONI considers we <b>exceed expectations</b> in terms of Service Ambition for the 2023-2024 Forward Work Plan.</p>
UR Service Priority Alignment	<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 <b>meets expectations</b> around the UR Service Priority Alignment for this role.</p>
<p>Stakeholder Engagement</p>	<p>SONI engaged with stakeholders throughout the preparation of the LCIS procurement, giving them the opportunity to express their views in two separate consultations, as well as meeting with SONI in bilateral meetings. SONI also strongly engaged and kept updated the Regulatory Authorities through workshops and fortnightly meetings.</p> <p>Finally, as part of the standard procurement process, SONI will endeavour to answer any clarification questions from tenderers during the Pre-Qualifying Questionnaire (PQQ) and RfP process.</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 <b>meet expectations</b> regarding stakeholder engagement for the planned deliverables for 2023-2024</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>SONI has introduced additional transparency in Appendix 5: SONI Performance Measures in terms of service accountability.</p> <p>As a result of the above, SONI considers that for this Plan, in relation to Service Accountability, we <b>meet expectations</b> for this role.</p>