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30 May 2022

Dear Jody/Timothy

SONI's Draft Transmission Development Plan for Northern Ireland 2021-30

CONSULTATION RESPONSE BY ENERGY SAVING TRUST

Thank you for giving us the opportunity to respond to the Transmission Development Plan for Northern Ireland (TDPNI) 2021-2030 proposals for the development of the NI transmission network and interconnection over the ten years from 2021. We recognise that the key priority of the plan is to achieve strategic objectives as laid out by national and EU policies which aim to achieve long term security and sustainability of the electricity supply together with competitiveness of the economy.

Energy Saving Trust is an independent organisation dedicated to promoting energy efficiency, low carbon transport and sustainable energy use. We aim to address the climate emergency and deliver the wider benefits of clean energy as we transition to

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net zero. We empower householders to make better choices, deliver transformative programmes for governments and support businesses with strategy, research, and assurance – enabling everyone to play their part in building a sustainable future. As Programme Administrator, on behalf of the Utility Regulator, of the Northern Ireland Sustainable Energy Programme (NISEP) we understand the complexities and energy efficiency challenges in Northern Ireland and, with our UK and international perspective, this means we can contribute ideas and solutions for the future.

Our response focuses on the key areas of the Energy Saving Trust’s activities and related issues.

Energy Saving Trust recognise the challenges for both SONI and the Utility regulator following on from the publication by DfE of its new Energy Strategy “A path to net zero energy” in December 2021 [Energy Strategy – Path to Net Zero Energy | Department for the Economy \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/energy-strategy-path-to-net-zero-energy), and a future Decarbonising Heat consultation the results of which will have a major bearing on network demands. In addition, we welcome the considerable level of consultation and planning which SONI have conducted during the preparation of this plan together with use of ‘Tomorrow’s Energy Scenarios Northern Ireland’ (TESNI)⁶, which involves developing a range of possible energy scenarios dealing with renewables and the electrification of heat and transport.

In planning to meet Northern Ireland’s future commitments, investment will be needed in new renewable generation capacity and electricity networks. The transition to low-carbon and renewable energy will have widespread consequences; it will require a significant transformation of the electricity system. When planning for nearly zero carbon power, 2030 is simply a staging post and proposals for IGW of offshore wind power and significant solar as outlined in [The Path to Net Zero Energy. Safe. Affordable. Clean. \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/the-path-to-net-zero-energy-safe-affordable-clean) will invariably require to be facilitated.

Having passed Final Stage on 9th March, the Climate Change (No. 2) Bill will increase NI’s renewable electricity generation target, upon receipt of Royal Assent. [Draft \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/draft) The Bill states: “15.— (1) The Department for the Economy must ensure that at least 80% of electricity consumption is from renewable sources by 2030.”

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We are aware that currently this development is being considered, and the revised TDPNI although written prior to this development should really be revised further to be reflective of it.

Energy Saving Trust would support the Network reinforcement projects described in the North and West Planning Area which will enable the transmission network to safely accommodate the more diverse power flows which are a result of excess regional generation. It is vital that transmission system developments keep pace with the connection of new renewable generation, otherwise constraint levels will almost certainly make future renewable investments less viable and potential carbon savings will not be realised.

We fully support the development of the second North-South interconnector. While it is disappointing that the delivery date has slipped, we are aware of the planning difficulties that the project has faced. We recognise that a substantial proportion of current constraints of renewable generation in Northern Ireland would be removed when the North-South interconnector is complete and the full integration of the 500MW export capacity on the Moyle interconnector is realised and welcome the proposed dates for each.

Energy Saving Trust recognise that to deliver developments of the transmission system in line with the 80% by 2030 target SONI will require considerable resources. It is important to realise both current consumer cost increases and the savings likely to be achieved by this investment. NIE Networks for Net Zero study [networks-for-zero-net.aspx \(nienetworks.co.uk\)](https://www.nienetworks.co.uk/networks-for-zero-net.aspx) shows that due to downward pressure increased renewable generation has on the wholesale price of electricity, that there will be a net consumer saving of 1% after taking account of all the necessary grid investments.

In examining the information areas highlighted in the Utility Regulators 2020-2029 decision paper, we believe that many have been adequately addressed in this TDPNI with Appendix B outlining the drivers and needs however further detail (item 6) in terms of the costed benefits of certain projects would add understanding to future submissions.

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If you require any further information or would like to discuss the Energy Saving Trust response in further detail, please do not hesitate to contact me on 07715 368290

Meanwhile I trust that you find our response helpful.

Yours sincerely

Robert McCreery
Policy Officer
Energy Saving Trust
Northern Ireland

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