

Barbara Brown
Utility Regulator
Queens House
14 Queen Street
Belfast, BT1 6ED

29 February 2024

Dear Barbara,

RE: Draft Forward Work Programme 2024/2025

Thank you for the opportunity to provide feedback on the consultation paper for the Draft Forward Work Programme (FWP) 2024/2025.

We consider the timing of this consultation, which we recognise is the first of five FWPs, has not afforded adequate timing for the UR to reflect and consider feedback provided in the Corporate Strategy consultation that we consider significantly influences the Draft Forward Work Programme 2024/2025.

We have reviewed the draft paper, and firstly we consider that the factors influencing the market that the UR has defined are both relevant and balanced and provide an appropriate foundation in which the FWP was developed on. We have outlined in our detailed responses against each of the strategic objectives in the consultation paper in the subsequent pages. In forming our response, we have reflected on recent consultations including the Best Practice Framework for Vulnerable Customers, UR's Corporate Strategy, the Consultation on Guaranteed Standards of Service, and the Consumer Protection Programme 2024-2029. Throughout our response we recognise that many of the views, feedback and concerns are repeated across each of the respective consultations, and in many areas we have referenced these consultations.

In summary, Electric Ireland support many of the projects outlined in the FWP and feel that the alignment of the projects under the four strategic objectives of the Corporate Strategy provides an appropriate balance to the type projects in scope and ensures alignment with the primary strategic objective of the Corporate Strategy to deliver Net Zero targets through a Just Transition, whilst ensuring consumers are protected and supported. We recognise many of the projects outlined in the FWP will go through the appropriate consultation mechanisms to ensure fairness and transparency and Electric Ireland will welcome the opportunity to further engage on the relevant projects during 2024/2025.

In addition to the specific points of feedback raised in the previous consultations and captured in our response, Electric Ireland consider that there are risks associated with the implementation timelines and the capacity for both the UR and stakeholders to deliver the projects. Whilst we recognise many of the projects, c30%, span beyond the 2024/25 period, c50% of the projects in the FWP have a timeline to start/complete in Q4, and only 6% of the projects are scheduled to complete/start during the first 6months of the plan. We consider that careful reflection should be given to the volume and priority of activity outlined in the FWP, as well as challenges facing the industry as a whole, and the ability and capacity for the UR, energy stakeholders, government and NGOS, to deliver on the projects in scope within realistic timelines. Any delays during this 2024/2025 FWP period will ultimately impact on subsequent FWPs.

We welcome any comments and further engagement with the UR.

Yours sincerely,



Philip McGrady
Regulation & Compliance Manager
Electric Ireland NI



1st Floor, 1 Cromac Quay, The Gasworks,
Belfast BT7 2JD, Northern Ireland
Phone 0345 600 5335

www.electricireland.com

Electric Ireland's comments on the FWP projects

Strategic Objective 1: Supporting the Just Transition to Net Zero.

Electric Ireland is generally supportive of the projects under Strategic Objective 1 and we have provided comments on projects in the table below where relevant.

<i>Specific Project Comments</i>	
Project #1.6 – Benchmark and publish a report on other jurisdictional and regulatory approaches to a Just Transition to Decarbonisation, to define learning points for the UR.	<p>As outlined in our response to the consultation on the UR's Corporate Strategy, we support the UR's primary strategic objective to deliver Net Zero targets through a Just Transition, ensuring fairness to all and the protection of both current and future consumers. We look forward to seeing how the UR will drive inclusive stakeholder participation, including DNOs, TSOs, suppliers, consumers, NGOs, and government, as part of this project.</p> <p>As well as both seeking learnings on jurisdictional and regulatory approaches, the consumer must be at the core of any policies and strategies, therefore we consider that learning points on consumer engagement approaches would also be beneficial for the UR as well as the relevant engaged stakeholders to support a collective effort to deliver change on the journey to Net Zero.</p>

Strategic Objective 2: Securing our energy and water supply.

Electric Ireland is supportive of the projects under Strategic Objective 2.

Given challenges in recent years with PPM infrastructure, during Covid as well as more recent events, Electric Ireland considers that a review of the PPM infrastructure should be a project as part of the FWP 2024/2025.

Strategic Objective 3: Enabling best in class energy and water companies.

As outlined in the response to the consultation on the UR's Corporate Strategy, the reference of 'best/best-in-class' as a measurable goal, which we recognise is intended to be aspirational, we consider that this is subjective without context, clarity of who this relates to or an example of what best looks like in practice.

Consideration should be given to the following areas:

- Use of the word 'best' throughout the document and if used, a supporting description should be provided to create a clearer set of objectives that will inform planning for all stakeholders across the industry.
- Future proofing such a definition, as consumer expectations evolve, technology advances and societal focus shifts year on year - what is best in 2024 may look very different in 2029.
- The definition should be supported by evidence-based research, e.g. benchmarking, to inform and provide clarity to the market.
- Potential for any unintended consequences of seeking 'best', e.g. narrow focus on specific performance measures that may neglect other important areas where best has not been made a focus or may not be clearly defined.

In relation to the projects that are outlined under this Strategic Objective, eight of twelve relate to Price Control activity, which we recognise is a priority for this FWP given the review timeframes for of each respective price control, and Electric Ireland have separately provided feedback on the Power NI price control through the respective consultation.

We would however consider there could be a potential risk to future FWPs if the same volume of projects are expected year on year, taking into consideration the capacity for the UR and stakeholders to deliver on proposed programmes.

We have provided comments on projects under Strategic Objective 3 in the table below were relevant.

<i>Specific Project Comments</i>	
Project #3.9 – Design and implement new licence compliance framework including the development of a new public compliance reporting regime.	<p>Electric Ireland considers this project is unclear and would seek clarity on whether this project relates to the Consumer Protection Programme, the Best Practice Framework, REMM review referenced in #4.2 or whether this is a new framework that is being referenced?</p> <p>Electric Ireland welcomes any project to review and consistently improve the existing framework and we would welcome the opportunity to engage in the relevant consultation mechanism during 2024/2025.</p> <p>In relation to the publishing of data externally, we would consider that any consultation should include details of how information will be presented and contextualised for consumers, looking at best practice in other jurisdictions to ensure that the information provided is empowering for consumers, and consider the timing and format of such reporting and the impact it may have on consumers.</p>
Project #3.10 Assist DfE in planning roll-out of electricity Smart Meters.	<p>As outlined in our response to the consultation for the Consumer Protection Programme 2024-2029, Electric Ireland support the UR's view the consumer must be at the core to the development of Smart Metering in Northern Ireland. As a supplier who operates in multiple jurisdictions, we would welcome the opportunity to share insights, knowledge and learnings from our firsthand experience in Smart Metering.</p>

Strategic Objective 4: Providing the highest level of consumer service and protection.

For many of the projects captured under this strategic objective Electric Ireland have shared feedback separately via the relevant consultations, and we have noted this and comments on relevant projects in the table below.

<i>Specific Project Comments</i>	
Project #4.2. Complete a review of monitoring of the Retail Electricity and Gas Market.	<p>Electric Ireland welcomes a review of metrics used across the various reporting mechanisms, and we consider that this is an activity that should be conducted periodically in order to ensure any metrics remain relevant, balanced and appropriate in light of current and future trends.</p> <p>Electric Ireland considers that any enhancements from the review should explore optimising the growing suite of existing measures to ensure they remain relevant and efficient, as well as introducing any new measures, ensuring that the introduction of net new measures does not add further complexity to the existing REMM framework.</p> <p>As outlined in previous consultation responses from Electric Ireland, there should be consideration of the reporting functionality used across the supplier landscape and that system development may be required to deliver on any new reporting requirements.</p> <p>Electric Ireland also considers a review of the mechanisms of information exchange between industry participants and the UR should be included within the project, as current methods create risk in relation to data security and efficiency.</p> <p>In general, Electric Ireland welcomes the opportunity to engage in the associated consultation for this project during 2024/2025 as we consider a collaborative approach will lead to positive consumer outcomes.</p>

<p>Project #4.3 Deliver our Consumer Protection Programme (CPP) for 2024-2029.</p>	<p>Electric Ireland has responded separately to the consultation on the Consumer Protection Programme for 2024-2029. We would ask that the UR considers the views and feedback provided in that consultation when making any determination in relation to the relevant project in this draft FWP and subsequent FWPs. We appreciate the response to the consultation has not yet been completed and as a result the year one projects have not yet been identified.</p> <p>In our response to the Consumer Protection Programme for 2024-2029 we outlined that in summary that Electric Ireland supports the importance of ensuring Northern Ireland’s consumers are protected and supported, both in the present and through a Just Transition on the path to Net Zero, and we agree that the three themes in the CPP 2024-2029 ensure that the programme is balanced and ensure an evidenced based approach to implementing measures.</p> <p>Our key points of feedback in the CPP consultation response, relate to (1) the risks associated with the implementation of the measures and the capacity for the UR and stakeholders to deliver the measures within the programme, (2) ensuring stakeholder collaboration and appropriate apportionment of responsibilities to stakeholders both in the energy industry and outside of the industry , and (3) specific concerns raised in recent previous responses which we consider are also reflected in this consultation.</p>
<p>Project #4.4 Finalise Best Practice Framework project for electricity, gas, and water</p>	<p>Electric Ireland has responded separately to the Consultation on the Best Practice Framework. We would ask that the UR considers the views and feedback provided in that consultation when making any determination in relation to the projects in this draft FWP and subsequent FWPs.</p> <p>In our response to the Best Practice Framework Consultation, we outlined that in summary that Electric Ireland supports the new CoP and considers that it will have a positive impact on energy consumers in NI. Our primary points of feedback relate to (1) the data risk associated with the creation and management of a new care register, (2) further detail required in terms of how the new proposed measures will work, and (3) no industry working group has yet been established.</p>
<p>Project #4.6 Complete both Non-Domestic and Domestic consumer insight tracker research and review areas for new research.</p>	<p>Electric Ireland supports an evidenced based approach to informing policies and projects, and we welcome the consumer insight tracker for both Non-Domestic and Domestic consumers that the UR is developing. We would also welcome any opportunity from the UR to provide input to inform new areas for research.</p>

Organisational Projects

Electric Ireland welcomes the UR’s review of their market and consumer data banks we would also welcome any opportunity to provide feedback to inform the optimal way forward for the external “publication” of data, which we consider is an area which relevant stakeholders should be invited to share views through a consultation process.