

The Generation Licensing Team
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

24 August 2022

NOTICE UNDER ARTICLE 14(2) OF THE ELECTRICITY (NORTHERN IRELAND) ORDER 1992

CONSULTATION RESPONSE BY ENERGY SAVING TRUST

Thank you for giving us the opportunity to respond to the consultation paper which sets out the Utility Regulator's proposal to modify all electricity generation licences granted under Article 10(1)(a) of the above Order. We recognise that the key priority for the Utility Regulator (UR) is to mitigate against a security of supply risk in instances where secondary fuel stocks held are of limited sufficiency to effectively contribute to a fuel security event.

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

Energy Saving Trust recognises the complexities of the current international energy supply environment, and the need to adequately protect the security of supply of electricity in Northern Ireland. On balance we support this initiative by the Regulator as it is aimed at assisting with the effective management of an event where primary fuel supplies for electricity generation are, or at risk of being, disrupted and generators instructed to prepare for or to switch to secondary fuels in anticipation for, or the result of, the Department of Economy declaring a Fuel Security Event.

Recognising the requirements outlined in the Northern Ireland Fuel Security Code [FSC PUBLISHED VERSION OCTOBER 2015.pdf \(economy-ni.gov.uk\)](#) we support the modification proposals, which will require Generators to report on and hold a secondary fuel quantity ordinarily required to operate the SF Generation Set at its maximum rated capacity on an uninterrupted basis for a continuous period of at least five calendar days. We realise that in reality the effect of this modification will only apply to those licensees who have capability of running on more than one fuel which will limit the administration requirement involved.

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 [REDACTED].

Meanwhile I trust that you find our response helpful.

Yours sincerely

Robert McCreery
Policy Officer
Energy Saving Trust
Northern Ireland