

STAKEHOLDER RESPONSES RECEIVED VIA EMAIL

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1	<b>Northern Ireland Electricity Networks</b>	<p><b>NIE Networks</b> welcomes the opportunity to comment on the Utility Regulator’s (UR) <b>Draft Forward Work Programme (FWP) 2023-24</b>. Our comments are set out in the table on the following pages. Beyond the points made below, we would like to make a general comment that many workstreams have the timings or key milestones marked as “multi-year.” We appreciate that these may be strategic initiatives that will naturally run over the span of several years but we believe it would be helpful if details were provided as to what specific aspects of the workstreams, especially those pertaining to the Energy Transition, were to be completed in 2023-24.</p> <p>We would like to acknowledge the positive engagement and work with the UR, and others, in the past 12 months since the NI Energy Strategy Action Plan was published. We also look forward to continuing the positive engagements with the UR as we work towards developing a transformational RP7 price control for the period 2025 to 2031, in order that we are best placed to meet the considerable challenges and ambitions outlined in DfE’s Energy Strategy, and continue delivering good customer outcomes. We face a challenging but also exciting period ahead to 2030. We are confident that both the UR and NIE Networks can work constructively to address any challenges – for the benefit of everyone in Northern Ireland.</p>
2	<b>Power NI</b>	<p>Power NI welcomes the opportunity to respond to the recent draft Forward Work Programme (FWP) published by the Utility Regulator (UR). Power NI recognise that this years FWP is set against another extremely challenging year especially in the context of energy prices and multiple Government support schemes, all of which are over and above what could be termed as ‘business as usual’ features of the energy market.</p> <p>Power NI welcome that the 2023-2024 FWP is as expected and contains no regulatory shocks. It follows on from previous FWPs and is consistent with the UR’s Corporate Strategy. It remains an ambitious programme for work, particularly given the current climate.</p> <p>The 2023-24 FWP contains several strategic important projects which have a direct impact on Power NI.</p> <p><b>The Retail Electricity Market</b>  <b>Consumer Protection</b></p> <p>Power NI welcomes the work already completed to date on Consumer Protection, has engaged with the UR throughout the Consumer Protection process and will continue to do so in order to deliver the detailed goals of the programme, particularly around Best Practice Framework and a new CPP for 2024-29. 2</p> <p>However as stated last year, it is disappointing that the UR’s review Guaranteed Service Standards (GSS) has not yet concluded. The GSS regime offers an opportunity to define how NIE Network’s provide network related services to customers both in terms of general reliability and quality as well as services requested via the customers supplier. At present there is little reporting or transparency in relation to NIE Networks performance against the GSS and no opportunity for suppliers to input into or change the setting of standards. Suppliers have the most interaction with customers and any perception of poor service by NIE Networks is reflected on the supplier. It is therefore crucial that the UR implement a process which facilitates scrutiny and review.</p>

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		<p><b>Security of supply and low carbon future</b></p> <p><b>Facilitate regulatory framework for flexible technologies</b></p> <p>The path to net zero will require new and innovative regulatory approaches. Innovation will come from electricity suppliers who have both the relationship with the customer and the inherent ability to offer aggregated routes to market. The immediate difficulty is that in many instances and in Power NI's specific case, the regulatory framework either restricts or prevents solutions being brought forward. As the UR is aware Power NI has, particularly in the last number of years, put forward a number of innovative projects which required regulatory approval and a review of licence conditions to enable them to proceed. Whilst the approval of such projects has been welcome, the timescales for this approval has been long and at times putting Power NI at a competitive disadvantage. Power NI welcome this issue being acknowledged in the FWP, as failure to address this issue will not foster an innovation culture and risks the UR becoming a blocker to innovation and the energy transition.</p> <p><b>Implementation of energy strategy to help deliver net zero</b></p> <p>The Net Zero target will be challenging for Northern Ireland given the significance of agriculture in our economy, our reliance on oil for heating, the energy efficiency of our housing stock, the transportation infrastructure, prevalence of private cars and our relatively small highly dispersed population. Consumers need to be placed at the centre of whole systems approach to the energy transition and Power NI would encourage UR to continue to place a focus on consumers in work undertaken with DfE.</p> <p>Discussions in relation to the energy transition can often focus on grid development, smart technologies and niche or speculative schemes. At the heart of the energy sector are customers who ultimately pay for all of the upstream activities and to achieve the net zero target it is customer behavioural changes which will ultimately determine whether that target is met. Customers will need support, information, choice and incentives to change behaviours. It is however important to recognise, understand and reflect that customers are not a single homogenous group. Customers will want a range of options which so that they can decide what meets their particular needs. Some customers will want to become fully immersed in the energy market, becoming prosumers willing to respond to real-time signals and actively manage their load. Others will want to be informed and have a good understanding of their usage while others will not be particularly interested in energy and require protection and confidence in the operation of the market. All customers however will be interested in the price they pay for their energy. Power NI would call on the UR to ensure that work assisting DfE on implementation of a revised long-term framework for energy in Northern Ireland places remains customer centric, so that customers are not left behind, particularly those most vulnerable.</p> <p><b>Enabling 21st century networks</b></p> <p><b>Smart Metering and review of electricity tariff structures</b></p> <p>Power NI understands that the UR's FWP project in this area relates to the consideration of smart metering and ensuring that tariff structures remain appropriate, particularly for customers in light of the energy transition. From Power NI's</p>

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		<p>perspective, other markets who have rushed towards smart metering, at a significant cost to the consumer have been preoccupied with getting data and entangled in the various regulations surrounding it, rather than putting the customer at the focus of the solution. Power NI believe that smart metering must be customer solutions and service driven, recognising that customers are not a homogeneous group. Customer driven solutions should be offered to customers rather than forced upon them. Some customers will have a desire to actively engage in the market and the behaviours or services that they wish to offer will require a detailed data view, which will likely require a smart meter. Other customers will want to be informed and take control themselves. For those customers a more appropriate solution may be the current, lower costs, developments in the areas of prepayment technology and consumption monitors / controllers in the home. All of these products come at a significantly lower costs than a full smart metering solution. Other customers may choose or may not be able to have that level of insight or control and simply wish to be protected, as energy may not be a priority item for them.</p> <p>Structure of tariffs will be important and both the UR and DfE should look creatively at how any potential smart meter roll out can be funded and not simply fall back to pass through costs. It has traditionally been relatively easy to apply costs to electricity tariffs as it is a highly regulated industry, and a small number of suppliers will collect the required funds. Given where electricity costs are and the current Government support packages that are being implemented to support customers energy bills, other ways to finance any potential roll out should be considered.</p> <p>Power NI would urge the UR to give due consideration to other jurisdictions and lessons learnt when it comes to the entire question around smart metering. Power NI is committed to working constructively with the UR across the range of projects referenced in the FWP and hopes that the UR will address those issues highlighted above.</p>
3	NI Water	<p><b>Draft Forward Work Plan 2023 - 2024</b></p> <p>Thank you for providing us with the opportunity to comment on the Utility Regulator's draft Forward Work Plan 2023-24.</p> <p>You will know from previous correspondence that we are supportive of your three strategic objectives, both from the perspective of the regulated water utility in Northern Ireland as well as the single largest electricity consumer. 'Enabling 21<sup>st</sup> century networks' and 'Enabling security of supply and a low carbon future' particularly resonate with our own company strategy and our PC21 Business Plan. We summarise our views in relation to projects identified under each strategic objective below. 'Promoting markets that deliver effective competition, informed choice and fair outcomes'.</p> <p>NI Water is fully supportive of the Utility Regulator's Consumer Protection Programme. While our household customers do not directly pay a water bill, and therefore, are not financially vulnerable in relation to our services, we recognise that they may be vulnerable due to age, disability or serious medical condition. We are encouraged by the engagement to date on the aspects of the Consumer Protection Programme that are relevant and appropriate for our customers - in particular our vulnerable customers. We look forward to continued engagement with the Utility Regulator on ensuring that appropriate</p>

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		<p>consumer metrics and targets are challenging but achievable and incentivise the delivery of the best possible levels of service.</p> <p>'Enabling 21st century networks'</p> <p>We welcome the inclusion in the plan of the PC21 mid-term review. We welcome the engagement with the Utility Regulator that has already taken place in advance of this review and encourage the Utility Regulator to continue to work with us to ensure a meaningful review that addresses customers' needs. We welcome the Utility Regulator's support in the PC21 Final Determination for a commitment to medium-term funding and the acknowledgement that investment of the magnitude proposed in PC21 can only be delivered successfully if a funding commitment is secured. We trust that the Utility Regulator will continue to support this need as part of the PC21 mid-term review.</p> <p>We are encouraged to see the inclusion in the plan of a project to review the NI Water regulatory model. We are acutely aware that fundamental datasets underpinning the regulatory price control methodology must be supported by the systematic collection of such data throughout the price control period. We welcome the opportunity to engage with the Utility Regulatory in reviewing data submissions, such as the Annual Information Return, with a view to ensuring that they provide the most appropriate and robust data for subsequent price controls.</p> <p>'Enabling security of supply and a low carbon future' The draft Forward Work Plan makes several references to the Department for Infrastructure's Long Term Water Strategy in terms of leakage, water quality and security of supply. We should emphasise that a key dependency for NI Water delivering against the Long-Term Water Strategy is that NI Water is adequately funded. Finally, we note that you have signalled a significant increase in the Utility Regulator's costs in 2023/24. As you will be aware, NI Water's status as a non departmental public body (NDPB) makes it difficult for us to absorb unexpected, in year cost increases especially given we are already experiencing significant budgetary pressures.</p> <p>In order to mitigate the impact of these increases we would ask that you provide us with an early indication of the increased annual licence fee as soon as possible.</p> <p>In conclusion, as we develop our PC21 mid-term review submission, we see significant challenges ahead for our industry which will require a joined-up approach.</p> <p>We look forward to engaging with the Utility Regulator and other stakeholders, working together to secure the funding to underpin a thriving population, a growing economy and a flourishing environment in Northern Ireland.</p>
4	EPUKI	<p><b>EPUKI Response to Utility Regulator Draft Forward Work Programme 2023/2024</b></p> <p>EP UK Investments Ltd. (EPUKI) welcomes the opportunity to respond to the Utility Regulator of Northern Ireland's (UREGNI) draft Forward Work Programme (FWP) for 2023/2024. This document sets out the key projects which the UREGNI will focus on across the year. EPUKI has concerns around the treatment of gas transmission within this workplan. While a review of gas transmission arrangements has been included in the workplan, we believe that this area of work is critical to the strategic objectives of the UREGNI and will deliver positive outcomes to both industry and consumers. As such, we request that this project is treated with utmost urgency in 2023/2024 and prioritised as much as possible.</p>

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		<p>EPUKI recognises the review of gas exit capacity arrangements to be fundamentally important to the Northern Irish market. We are concerned that this project may be delayed, which would have a detrimental impact on a number of the Strategic Objectives identified in the FWP. It is understood that this project was originally included in the 2021/2022 Forward Work Programme, with a timeframe of Q4. It was later included in the 2022/2023 Forward Work Programme, with a 'Full Year' timeframe. It has now been included in the 2023/2024 Forward Work Programme with a 'Multi Year' timeframe.</p> <p>This raises two distinct concerns around the timing of this project. Firstly, it is unclear that the project will be completed at all, given that it has remained on the FWP for a number of years with little signs of any progress. This suggests that the UREGNI is not prioritising this project. We believe that this may be due to the UREGNI overlooking the importance of this project to a number of areas of the Northern Irish market. This has been detailed further below with reference to the Strategic Objectives.</p> <p>Our second concern is that the expected duration of this project has increased substantially since it first appeared on the UREGNI's FWP. It is unclear if this has been driven by scope creep of the review itself, or a reduced allocation of resources to the project, however it is essential that this project is completed as quickly as possible. Failure to carry out this review in a timely manner represents a negative market signal to investment in new generation in Northern Ireland.</p> <p>EPUKI has been engaged with the UREGNI over the last number of months in relation to the introduction of short-term exit capacity booking arrangements. In the interest of expediting this project, to the extent possible, we will continue to support and engage with the relevant personnel within the UREGNI to ensure the timely completion of this project. To maximise the potential upside of delivering short-term gas capacity arrangements we believe that the UREGNI should target Q2 2023 for completion of this project.</p> <p>The introduction of short-term gas exit capacity booking arrangements is consistent with Strategic Objective 1: "<i>Promoting markets that deliver effective competition, informed choice, and fair outcomes</i>". By allowing the booking of gas exit capacity in a shorter timeframe, Northern Irish gas peakers would significantly reduce their short-run marginal costs (SRMC). Such a reduction in SRMC would result in Northern Irish units better able to compete in the Single Electricity Market (SEM). As well as delivering increased competition, this outcome would also result in lower costs for consumers. This is also a fairer outcome, allowing peaking units to fund the gas network at a level which is reflective of their usage, rather than proportionally larger which would be the case under the current arrangements.</p> <p>Strategic Objective 2: "<i>Enabling 21st century networks</i>" is also furthered by this project. The current gas capacity booking arrangements in Northern Ireland were developed for traditional electricity systems where conventional generation would typically run non-stop. Increasing volumes of renewable energy is causing power systems to evolve and in the future conventional generation will play a more intermittent role, supporting the likes of wind and solar energy. In order for this to be possible, the network arrangements need to be updated to reflect the changing characteristics of the power system. Introducing shorter-term capacity arrangements is a move toward more modern and best practice energy network regulation.</p>

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		<p>Finally, EPUKI believes that this project is necessary in order for Strategic Objective 3: “<i>Enabling security of supply and a low carbon future</i>” to be fulfilled. As outlined in the above paragraph, the facilitation of new, flexible conventional generation units on the Northern Irish power system is conducive to greater deployment of renewables and the development of a low-carbon system. Additionally, because this project facilitates the connection of flexible generation, we expect the Security of Supply of Northern Ireland to be furthered through its completion.</p> <p>The current booking arrangements mean there is a competitive disadvantage for units based in Northern Ireland compared to other SEM generators. Additionally, the continued absence of such booking arrangements impairs generator financeability by incurring costs which cannot be recovered through any of the existing revenue streams. Failing to guarantee cost recovery will further disincentivise investment due to the risk of significant losses.</p> <p>Delays in this project also be detrimental to regulatory certainty in Northern Ireland. Failure to deliver a review of exit capacity arrangements in a timely manner, particularly after several years of signalling an intent to, would undermine investment certainty, further reducing the probability of future investment in capacity in Northern Ireland. This would have a damaging effect on Security of Supply.</p> <p>In addition to a dampening effect on potential new investment, a failure to implement short-term gas capacity booking arrangements would negatively affect the feasibility of existing generation. Ballylumford C Power Station has a Power Purchase Agreement in place until September 2023. Upon the expiry of this contract, it is unclear whether it will remain economically feasible to operate the power station without short-term capacity booking arrangements in place. This compounds the impact of this project on Security of Supply in Northern Ireland. Given the fact that this project has been included on the FWP for a number of years, failure to implement it in a timely manner would be a particularly disappointing outcome.</p> <p>The positive impact of this project on consumers, coupled with its alignment to key Strategic Objectives identified in UREGNI’s FWP mean it should be treated with utmost priority within 2023. We note that the FWP recognises that the project is linked to all five corporate success measures, therefore delivering it in a timely manner would represent a significant achievement for UREGNI. EPUKI trusts that UREGNI recognises the urgency of this project and will progress same accordingly. In the meantime, we are open to further discussion or a bi-lateral meeting to discuss any of these points further should there be in merit in doing so.</p>
5	<b>Mutual Energy</b>	<p>This response to the consultation on the Utility Regulator for Northern Ireland (UR) Draft Forward Work Programme (FWP) for 2023-24 is on behalf of Mutual Energy.</p> <p>Mutual Energy owns and operates critical electricity and gas transmission infrastructure in Northern Ireland. The Moyle Interconnector is a 500MW high-voltage direct current electricity interconnector between NI and Scotland, linking the all-island Single Electricity Market (SEM) with the GB market. Mutual Energy also owns the Scotland-Northern Ireland Pipeline, a high-pressure natural gas pipeline between NI and Scotland, and much of the onshore gas transmission</p>

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		<p>network in NI. As a mutual company, Mutual Energy does not have shareholders and instead operates in the long-term interests of Northern Ireland consumers.</p> <p><b>1. Overall comments</b></p> <p><b>1.1 Timings</b></p> <p>We observe that of the 23 projects listed in this year’s draft FWP, 19 are given timelines of ‘multi-year’. We understand that many of the workstreams are complex and getting the right outcomes for consumers takes time, and therefore it is understandable that many projects will not be completed within the coming twelve months.</p> <p>However, 80% of intended projects currently do not have any concrete milestones against which to measure progress. We would propose that UR reviews the draft FWP and where a project is not expected to be completed within the forthcoming year, we suggest developing interim milestones indicating what progress and deliverables are intended to be achieved within the year. We also suggest that other key developments in the workstreams, such as the anticipated date of public consultations, are highlighted.</p> <p>Taking this approach would have several benefits. Not only would it allow stakeholders to understand and plan where their input will be required throughout the year, it will also allow different projects to be tracked and progress measured.</p> <p><b>1.2 Descriptions and outcomes</b></p> <p>The project descriptions, scopes and anticipated outcomes in the draft FWP are all very high-level. While individual stakeholders might have a good idea what each is referring to if they are closely involved with the workstream, it becomes more difficult to understand what different workstreams are looking at or trying to achieve where a stakeholder is not closely involved in them.</p> <p>For example, the first action under ‘Organisational Projects’ is simply noted as a “multi-year” workstream to “<i>work with DfE and stakeholders to review the appropriateness of our vires in light of the energy strategy and climate change legislation</i>”. UR’s FWP 2022-2023 contained a very similar action. However, at the stakeholder session facilitated by UR on 23 January 2023, UR outlined its understanding, based on collaboration with DfE to date, that a public consultation on this is expected in 2023. It is not clear, however, whether this will be a UR or DfE-led consultation (or a joint consultation), the anticipated date that this consultation(s) will be issued, or what the next steps following the consultation are likely to be. A best estimate of this sort of information – even if subject to some uncertainty and outside UR’s direct control in terms of scope and timing – needs to be captured in the FWP.</p> <p><b>MEL strongly recommend, therefore, that a review of each action is carried out and specific milestones, etc. and timings of same be defined, to the greatest extent possible.</b></p> <p><b>1.3 Project interactions</b></p> <p>There will necessarily be some overlap or interactions between different projects listed in the FWP. For example, project 2.7 (Assess the impact on gas transmission arrangements of projected demand for gas) will have quite considerable overlap with project 3.5 (Establish enhanced monitoring arrangements for security of supply in Northern Ireland) as</p>

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		<p>increased gas demand/capacity requirements may require changes to gas transmission arrangements or investing in the gas network to avoid security of supply issues from becoming a reality.</p> <p>Given these overlaps, the FWP would benefit from a more complete roadmap of the different projects and how they interact, presenting key joint considerations and milestones across several projects.</p> <p><b>1.4 Business-as-usual vs projects</b></p> <p>We would like to see workstreams which are considered specific projects or new workstreams separated in the FWP from business-as-usual work. For example, project 3.1 (Deliver SEM capacity auctions in line with programme) is clearly a business-as-usual workstream which UR has to undertake as part of its duties, as are price controls. We feel the FWP has more value in highlighting specific projects which UR is undertaking in addition to its BAU functionality.</p> <p><b>2. Selected projects</b></p> <p><b>2.1 Organisational Projects</b></p> <p>We support the commitment to <b>working with DfE and stakeholders to review the appropriateness of UR’s vires in light of the energy strategy and climate change legislation (Organisational Project 1)</b>. This should be a top priority for both UR and DfE. The work needs to start now to ensure that NI energy supplies decarbonise consistent with meeting energy and climate policy targets, however this work requires a supportive regulatory framework. UR’s vires should not be a blocker to this work progressing in the short- or long-term.</p> <p>MEL will be supportive of amendments to UR’s vires which facilitate the energy transition, while protecting security of supply and consumer interests.</p> <p>In the absence of a functioning NI Assembly and Executive, however, it is important to push forward the energy transition within existing legal frameworks. We therefore suggest that any consultation process on UR’s vires set out the limitations of its current vires, so that stakeholders can more clearly understand and respond to the basis on which UR sees its responsibilities.</p> <p>We understand, for example, that UR does not have the requisite legal authority to regulate 100% hydrogen pipelines or storage. However, 100% hydrogen networks are a less realistic prospect in the immediate term. The technical and regulatory preparatory work to progress readiness for facilitating blending of hydrogen within the existing natural gas network, however, is something that could – and MEL would suggest <i>should</i> – commence over the coming 12 months.</p> <p>We say ‘should’ as:</p> <ul style="list-style-type: none"> <li>(i) the criticality of such preparatory work is down to the need to ‘keep step’ with developments in GB and RoI, due NI’s reliance on gas imports and progress being made in those jurisdictions;</li> <li>(ii) NI demonstration projects are required for NI gas network operators to advance the technical work required, as well as economic and safety regulatory provision, which will take a number of years to develop, and MEL are hopeful funding opportunities for such projects to commence may emerge during the period of FWP 23-24 (including potentially through regulatory allowances); and</li> </ul>



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		<p>(iii) gas network blending can potentially play a strategically important role in stimulating the hydrogen economy. The UK-wide hydrogen business model is considering supporting blending (even if only as a ‘reserve offtaker’) to underpin investor confidence by reducing ‘volume-risk’, and it is important that NI producers are not disadvantaged relative to GB counterparts, due to NI falling further behind in gas network readiness. The importance of this is only further underscored when considering the potential benefit of electrolytic hydrogen production as a mitigation to renewable energy curtailment, which may threaten the viability of further renewable electricity generation capacity deployment and meeting the 2030 renewable electricity target of at least 80%.</p> <p>We believe that UR’s existing vires are sufficient for it to regulate this work, and that Organisational Project 1 should not be a pre-requisite to its ability to support such workstreams commencing.</p> <p><b>2.2 Strategic objective 2: Enabling 21<sup>st</sup> century networks</b></p> <p>We support the inclusion of <b>project 2.6 (Scope post implementation issues applicable to biomethane injection)</b> and as a gas TSO will work with UR, the other NI gas network operators and industry as appropriate to establish a suitable framework for efficiently facilitating biomethane injection into the NI gas network, including the transmission network. UR will be aware of the potential network constraints (and options for solutions to same) arising from the variability of demand profiles on the NI distribution system, relative to typical biomethane production profiles. Therefore, the commitment by UR to facilitate delivery of renewable gas in line with developing energy policy and emerging interest in biomethane injection calls for a framework in which such constraints will not unduly inhibit biomethane producer investment confidence in routes to market enabled through gas network injection.</p> <p>We welcome the reference to a review of connections policy in this regard, to ensure an appropriate, forward-looking regime where connection costs for producers are not prohibitive, potentially involving anticipatory network investment in alleviating such constraints. We are mindful, however, that there are still outstanding tasks to be undertaken to implement biomethane injection from the initial phase of the project, including licence amendments for gas network operators, and we cannot lose sight of these.</p> <p>With regards each of the points made above on biomethane and hydrogen blends, these are consistent with the ‘designated regulatory gas objectives’ introduced in 2020 to UR (and DfE’s) ‘principal objective’ in relation to gas, specifically:</p> <ul style="list-style-type: none"> <li>▪ <i>“helping to achieve...the integration of large and small scale production of gas from renewable energy sources and distributed production in both transmission and distribution networks”, and;</i></li> <li>▪ <i>“facilitating access to the network for new production capacity, in particular removing barriers that could prevent access for new market entrants and of gas from renewable energy sources”.</i></li> </ul> <p>As we noted in our response to FWP 22-23, we again note that the action relating to the <b>development of a digitalisation strategy for the electricity network (project 2.1)</b> appears inconsistent with the Energy Strategy, in which an objective of</p>

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		<p>an “an accessible and digitised <b>energy</b> system where data provides value for consumers and system operation”, was defined to deliver the vision to “create a flexible, smart and digitised <b>energy</b> system that integrates renewables across heat, power and transport, creates value for consumers and enhances security of supply”. UR will be aware of the work ongoing to develop a draft Northern Ireland Smart Systems Flexibility Plan (SSFP), ahead of public consultation later this year. The SSFP is being prepared as “an energy plan, not simply an electricity plan”. Therefore, we would expect the action that UR includes in its FWP should include gas and electricity within its scope.</p> <p><b>2.3 Strategic objective 3: Ensuring security of supply and a low carbon future</b></p> <p>We will also engage with UR on <b>project 2.7 (Assess the impact on gas transmission arrangements of projected demand for gas)</b>. We consider this as part of a wider programme of work which will incorporate <b>project 3.5 (Establish enhanced monitoring arrangements for security of supply in Northern Ireland)</b> and <b>project 3.9 (Develop and implement improvements to the SEM capacity market)</b>. The electricity capacity market has delivered additional gas-fired generation which means that peak gas demand is likely to increase significantly. In this context, system planning will require closer co-ordination between gas TSOs, SONI and UR going forward to facilitate proper whole-system planning.. We anticipate that this will be a significant piece of work and require involvement from multiple stakeholders, including the distribution network operators for gas and electricity.</p> <p>We will also work with UR and GMO(NI) on <b>project 3.10 (Complete an exit review for gas)</b>, and we understand that UR are planning to consult on this issue early in 2023.</p> <p>As owner of the Moyle Interconnector, we will engage with UR on <b>project 3.6 (Commence a review of interconnector policy development)</b>. We anticipate that this will not directly impact on Moyle’s regulatory arrangements and is more related to long-term support mechanisms for potential new interconnectors.</p> <p><b>2.4 Strategic objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes</b></p> <p>In terms of <b>project 1.4 (Implement new arrangements for ancillary services)</b>, we are aware that these new arrangements are currently only at the high-level design stage, and the SEM Committee has in its forward work plan for the coming year “system services future arrangements high level design implementation, day ahead system services arrangements and layered procurement”. We are mindful that implementation cannot progress without a detailed design of the new ancillary service arrangements being defined and we stress that this work needs to progress urgently or the existing DS3 arrangements need to be further extended.</p> <p><b>3. Suggested additional workstreams</b></p> <p>Notwithstanding our comments on Operational Project 1, where we understand that UR wishes to clarify its authority in relation to facilitating the energy transition, we believe that some work needs to begin now in terms of hydrogen readiness for Northern Ireland.</p> <p>As all of Northern Ireland’s gas comes from the GB gas National Transmission System (NTS), it is imperative that NI maintains pace with developments in GB to ensure it is ready to receive hydrogen blends when necessary. MEL, Gas</p>

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		<p>Networks Ireland, and National Gas Transmission (formerly National Grid Gas Transmission (NGGT) have established a 'Moffat Interconnection TSO Coordination Group' to co-ordinate at TSO level on how gas supply via Moffat may evolve over the medium to longer-term. We expect to soon be in a position to engage with UR (and DfE and HSENI) on an initial 'Roadmap' document produced by the TSO's to frame the relevant issues and explain the need for a cross-border interconnection policy co-ordination framework to be established. We similarly suggested in our response to draft FWP 22-23 that a commitment from UR to formally engage with NGGT and Ofgem on this matter be included and again suggest that a specific commitment be introduced to FWP 23-24 to establish such a framework.</p> <p>Additionally, work must get underway within Northern Ireland in relation to hydrogen blending within the gas network locally if NI is to realise the potential of a hydrogen economy. Hydrogen production within Northern Ireland has potential to scale over the coming years, however, to make this economic and mitigate volume risk, the hydrogen needs a stable demand sink. With suitable technical development and economic and safety regulatory framework establishment, the NI gas network could potentially provide this, and in order to be ready to accept large volumes of blended hydrogen, trials must begin now to ensure that this can be done safely and efficiently.</p>
6	RenewableNI	<p>RenewableNI (RNI) is the trade association and voice for the renewable electricity industry in Northern Ireland. We represent over 50 businesses, fostering knowledge exchange, sharing best practice and supporting policy development. Engaged in wind, solar and battery storage, our members make up a large majority of the renewable industry supply chain. RNI welcomes the opportunity to respond to UR's Forward Work Programme for 2023-2024.</p> <p><b>Policy Context</b></p> <p>The UK Government has set in legislation a requirement for a 'net zero' economy by 2050. As the leader in decarbonisation, the power sector will have to achieve zero carbon first, with heat and transport expected to significantly electrify as the main way of cutting emissions. The International Energy Agency has stated that all advanced economies must achieve zero carbon power by 2035 and the UK Government has made a commitment to achieve this. Working in conjunction with Wind Energy Ireland, RNI is committed to driving policy to deliver zero carbon power on the island of Ireland by 2035. This can only be achieved if the necessary level of renewable generation and the required zero carbon system services, are facilitated by the electricity network.</p> <p><b>Summary</b></p> <p>RNI welcomes the consultation on UR's Forward Work Programme for 2023-24. We support the inclusion of the various projects noted, particularly any of the actions that help NI in achieving its renewable energy targets. We note that for the majority of projects, the timing noted is 'Multi year'. It would be useful for this to be broken down further into key milestones in order to ensure that progress is achieved in a timely manner and that there is clear accountability for the achievement of these. In order to ensure that projects are achieved successfully, it would also be useful to create further alignment between the relevant policy makers and stakeholders. A set of common modelling scenarios or goals would create further</p>

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		<p>incentive for collaboration and for each stakeholder involved in implementing change to take accountability for their part. Decarbonisation for NI should be the core overarching goal for the relevant Departments, the UR, NIE Networks, and SONI.</p> <p>It should also be determined which of the proposed projects require legislative change in order to implement them. The lack of an Executive remains to be an issue for progressing change in NI, therefore it should be clearly established what we are still capable of achieving in its absence. In addition, this would also allow NI to have in place a clear forward plan of what legislation will be needed once it resumes.</p> <p><b>Strategic Objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes.</b>            Project 1: Implement new arrangements for ancillary services            We support the proposed project to develop transitional arrangements and progress the detailed design of new competitive arrangements for system services. We note that this is a multi-year plan in terms of timing. It would be useful if the timeline for this could be broken down further to include specific targets that should be achieved for each period.            We support this project's inclusion as one of UR's strategic objectives, as it is crucial that there is certainty on future system service arrangements for Northern Ireland as soon as possible. The TSOs have signalled that their best-case implementation date for the future arrangements is October 2025. The current arrangements that were implemented in 2017 initially had an April 2023 end date. The expenditure cap of €235 million was designed for 2020 system needs, based on analysis carried out in 2014. Investment assumptions were based on the new arrangements being in place by 2023, with access to new products and services, as well as energy markets in the case of storage, supported by increased expenditure on system services needed to deliver 2030 goals. It is widely acknowledged that more investment in low carbon service technologies will be required to meet 2030 system needs, and we appreciate any targets that will provide for certainty on the market arrangements and potential revenue streams available in order to progress projects.</p> <p><b>Strategic Objective 2: Enabling 21st century networks</b>            Project 4: Complete the NIE Network RP7 price control review            We acknowledge a focus on minimum cost throughout the RP7 document and the proposed approach. Considering the renewable energy goals for 2035 and beyond, a focus on what is to be considered a benefit for the medium and long term should also be considered, taking into account that a quicker energy transition is less expensive than a slow one in the long term.</p> <p><b>Strategic Objective 3: Ensuring security of supply and a low carbon future</b>            Project 1: Deliver SEM capacity auctions in line with programme            We support the UR's commitment to ensuring that the appropriate volume of capacity is secured through the capacity market. We note that SONI's own SOEF roadmap estimates around 1.5 GW of 2-6 hour storage will be needed in 2030, and we would encourage the UR to ensure that a sufficient volume of storage is secured in order to reach this.            Project 2: Work with DfE on the implementation of energy strategy to help deliver net-zero</p>

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		<p>We believe it is appropriate for UR to inform and contribute to the DfE Energy Strategy and any subsequent Strategic Energy Framework.</p> <p>Project 6: Commence a review of interconnector policy development</p> <p>The advancement of interconnection projects is crucial in enabling NI's RES targets. The North- South interconnector which was first proposed in 2010 is still in the planning system, and it is crucial that developments on this are progressed. We would welcome further clarity on the timelines pertaining to this.</p> <p>Project 7: Work with DfE to scope out regulatory framework to facilitate offshore wind connections</p> <p>We support the progression of the regulatory framework to facilitate offshore wind connections. In September 2022 RenewableNI published an offshore wind supply chain report <i>The Clean Revolution</i><sup>3</sup>, which noted that in addition to meeting enough clean electricity annually to power 1.6 million homes, or 2.5 million electric cars, <i>The Clean Revolution</i> report outlines:</p> <ul style="list-style-type: none"> <li>• a total of £1.9 billion will be spent on NI suppliers.</li> <li>• This results in a GVA of £2.4 billion and</li> <li>• 1,500 new jobs in peak construction years with a total of 32,400 FTE years across the life of the projects.</li> </ul> <p>This will save over 49 million tonnes of CO<sup>2</sup> emissions – the equivalent of taking 1.2 million cars off the road or planting 800 million trees. RNI will also contribute to the Draft OREAP consultation.</p> <p><b>Conclusion</b></p> <p>We would like to thank the UR for the opportunity to respond to its Draft Forward Work Programme for 2023-24. We would emphasize the need for clearly defined timelines and alignment with other relevant bodies to ensure that actions are achieved. It is crucial that NI's renewable energy and decarbonisation targets are met, and that the projects proposed in the workplan keep decarbonisation targets in mind.</p>
7	CCNI	<p>We welcome the opportunity to comment on the draft Forward Work Plan (dFWP) for 2023/24 set out by the Utility Regulator (UR). As the statutory consumer body for electricity, gas and water consumers we welcome the ongoing and deepening collaboration between the UR and the Consumer Council. The current acute energy affordability pressures, as part of the wider cost of living crisis have shown that there has never been a more important time for the UR and the Consumer Council to work together to protect the interests of consumers across Northern Ireland. We are committed to continue to further enhance this collaborative work and we look forward to working closely with UR throughout 2023/24. In providing context for the dFWP UR sets out some of the complex and wide-ranging factors impacting on consumers. Our recent consumer research shows how difficult many consumers' circumstances are, for example our latest Household Expenditure Tracker shows that Northern Ireland's lowest earning households have seen their discretionary income decrease by 46.7% compared to last year (£37.11 to £19.78), meaning these households have less than £20 per week to spend after bills and living expenses, and continues a trend of discretionary income falling for the last six quarters. Our January 2023 consumer pulse survey found that the majority of households (74%) believe their financial position is worse</p>

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		<p>than 12 months ago and only 16% believe their financial position will be better next year. Of the cost considerations driving this, energy prices (97%) remain the joint biggest concern for consumers, reinforcing the need for all stakeholders to maintain our efforts on energy affordability. Alongside these immediate financial and cost pressures is the need to upgrade consumer protections. We welcome the ambition on behalf of consumers shown in the dFWP through programmes such as the review of the Consumer Protection Programme and will continue to support this work. There are many interlinked areas of work to deliver the above, prepare and plan for net-zero and provide for sustainable, affordable long-term investment in our electricity, gas and water networks. Rather than comment on each individual project listed, below we provide comment we hope will add value for UR, above welcoming and agreeing with the dFWP proposals.</p> <p><b>Project alignment</b>  Many of the projects in the dFWP approach similar themes and topics as our own plans for 2023/24 (our own 2023/24 FWP will be published for public consultation in February 2023). As part of our deepening collaboration with UR we would welcome early discussions on potential project synchronisation and coordination. This is particularly relevant in the energy sector.</p> <p><b>Energy</b>  We welcome the energy projects proposed, particularly the introduction of guaranteed service standards for electricity, the NIE Network RP7 Price Control and work on digitalisation, scoping for smart metering, connections cost allocations and tariff structures. These projects provide the opportunities to deepen consumer protection and help ensure energy transition is delivered at the lowest cost to the consumer.</p> <p><b>Consumer support</b> – The introduction of guaranteed service standards should be prioritised. With increasing energy costs, consumer engagement with their supplier is increasing, and guaranteed standards of service will help ensure consumer focus is retained and consumer trust in the sector is not diminished. In particular, we would welcome a focus on how standards can encourage companies to improve customer experience at first point of contact. This is necessary given that consumers across the energy sector are currently struggling to make initial contact with their supplier within acceptable timeframes and when contact is made is often subject to unacceptable response times.</p> <p><b>Consumer centricity</b> – It is important to keep the consumer central in the delivery of all strategic objectives, particularly in areas that will markedly impact consumer outcomes but which may not be apparent to the end user. To that end the Consumer Council looks forward to working closely with UR to ensure consumer centricity in the RP7 Price Control and SONI TSO Price Control determinations.</p> <p>We would encourage the UR to ensure robust triangulation of the potentially competing priorities stakeholders have reported to NIE Networks during its Price Control Business Plan engagement process to date. We would be keen to lend our expertise to these deliberations to ensure high quality outcomes that are in the best interest of the end user.</p>

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		<p>We would also encourage UR to re-establish the SONI independent expert panel to ensure robust oversight of the SONI price control business plan development. We would be happy to be represented on that panel as was the case prior to the 2020-25 Price Control Determination.</p> <p><b>Future consumer protection</b> – We have recently completed our first annual survey of attitudes and experiences of consumers and the energy transition. This research will be helpful when implementing the energy strategy, and we will gladly share the findings as we believe they will provide helpful background in the development of the UR’s projects including smart metering, digitalisation and consumer protection.</p> <p>The Northern Ireland Energy Strategy action we share with UR relating to protecting consumers during the energy transition to net zero continues to be a priority for the Consumer Council, and we look forward to working with UR and the Department for the Economy to embed the findings of the Call for Evidence into policy development and operational practice.</p> <p><b>Water</b></p> <p>We look forward to continuing to work with UR on the PC21 mid-term review, and gaining further clarity on the scope of the review of NI Water’s regulatory model to enable us to participate fully.</p> <p><b>Consumer vulnerability and protections</b></p> <p>We welcome the commitment to finalise the Best Practice Framework project and would like to see this remain a priority for completion early in 2023/24. We also look forward to working with UR in the review of its Consumer Protection Programme to ensure the regulatory framework and protections are keeping pace with consumer need. One additional area to consider within the Consumer Protection Programme would be a focus on business energy tariffs. Recent REMM reports<sup>345</sup> show Northern Ireland’s I&amp;C consumers paying higher than the EU-15 median, while Northern Ireland’s domestic consumers are paying less than the EU-15 median.</p> <p><b>Timelines</b></p> <p>Many of the projects are noted as multi-year. While appreciating that many of the objectives of the projects will be multi-year, it would be beneficial to have greater definition of which elements of these projects are planned for delivery in 2023/24.</p> <p><b>Organisational projects</b></p> <p>As UR progresses its internal restructure, we would find it useful to have clear communication of changes in teams/staff leads and responsibilities.</p> <p>Through the four Organisational Projects listed in the dFWP there is opportunity to help ensure the regulatory and consumer protection and empowerment regimes are appropriate in the current consumer landscape, and as Northern Ireland begins to progress towards net zero carbon emissions targets at pace.</p>

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		<p>We would be happy to engage with UR on the development of its more consumer focused approach to dealing with calls and correspondence. We have considerable experience in making improvements in similar services with utility companies and in providing our own services to a high level that meet consumers' needs.</p> <p>Overall, we welcome the proposals in the dFWP. We believe there is a significant risk of consumer harm in the context of high energy prices and as we seek to reduce carbon emissions. Therefore, it is more important than ever that the UR continues to work in partnership with stakeholders including the Consumer Council to understand the key areas affecting consumers and develop sustainable solutions to help support those in need, and we welcome your commitment to do so. The Consumer Council would like to reaffirm our commitment to collaboration with the UR and our mutual stakeholders to continue to meet the wide and varied needs of present and future consumers.</p>
8	Transmission Investment	<p><b>Consultation on the Utility Regulator Draft Forward Work Programme 2023-2024</b></p> <p>Transmission Investment (TI), as one of the UK's leading independent transmission companies, manages one of the largest offshore electricity transmission portfolios. TI has successfully participated in the NG ESO Pathfinder programme, securing contracts to provide stability services at four sites through the two most recent stability tenders and is developing interconnector projects between GB and France with RTE the French national TSO and the LirIC project from GB to Northern Ireland.</p> <p>TI owns 100% of TI LirIC Limited which is developing the interconnector project between south-west Scotland and County Antrim in Northern Ireland. It consists of over 100km of underground and subsea cables with a 700MW capacity between GB and ISEM markets: allowing power to be shared, enabling more renewable production in Northern Ireland, and increasing security of supply. Specifically, within the UR Forward Work Programme (FWP) we support the proposed change in approach where UR is intending to move away from detailed prescription to a pragmatic, principles-based approach, focussed on the outcomes to be an enabler of major infrastructural projects. We believe this is crucial to facilitate the large, often nationally significant, projects that do not easily fit within the current industry frameworks. We welcome UR's commitment to review interconnector policy and "facilitate potential new investment in electricity interconnectors", within project 6 under Strategic Objective 3. 2</p> <p>There is real urgency to completing this work. In GB, LirIC has already been deemed eligible for Cap and Floor, and Ofgem will make a final decision to provide a Cap and Floor arrangement at the end of the year, after assessing the benefits of the project. Initial studies of the benefits show LirIC will deliver over £900million in social economic welfare benefit, reduced wind curtailment and improved integration between the GB and ISEM markets that will deliver more renewable energy to NI. We believe rapid progress could be made on NI interconnector policy making by leaning on the comprehensive research, evidence and analysis completed by Ofgem to date. Ofgem recently concluded1: "<i>We think the cap and floor regime has been successful in delivering its objectives to date. Specifically, it has incentivised the development of further GB electricity interconnection capacity that is in the interest of consumers.</i>" and "<i>The principles of the cap and floor regime remain appropriate to incentivise further interconnector capacity development</i>" Extending Cap and Floor to NI would see a</p>



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		<p>consistent UK-wide approach to support these large interconnector investments – at a scale similar to the whole of the NIE Networks RP6 investment programme of £657M2. If the NI regime could be established in a similar timeframe to Ofgem’s Window 3 process it would create the certainty to progress the project at pace to support the 2030 ambition (in the NI Climate Change Act 2022) of having at least 80% of electricity consumption from renewable sources.</p> <p>We would support the expansion of the UR staff to have the capacity to redesign existing processes and policies, which are currently being stretched and strained by the pace of the energy transition. A fully staffed regulator is critical in accelerating the industry change, to facilitate the unprecedented investment necessary for meeting the NI’s Net Zero ambition.</p>
9	GNI (UK)	<p>GNI (UK) welcomes the publication of the Utility Regulator’s <b>Draft Forward Work Programme 2023-2024</b>. We are happy to provide feedback on this comprehensive business plan, which we note, is positively framed by a focus on cost of living; protecting customers; delivering net zero; and prioritising a secure, long-term, and reliable security of supply.</p> <p>In acknowledging the ambition of the overarching programme, GNI (UK) supports the focus on the implementation of the Northern Ireland Energy Strategy, noting in parallel, that all relevant stakeholders are required to be sufficiently resourced in order to carry out the various workstreams and we look forward to engaging with UR to agree appropriate resourcing and allowance required to enable the delivery of the energy strategy.</p> <p>Having attended the January stakeholder workshop and reviewed the consultation paper in detail, GNI (UK) makes the following additional observations in relation to the key actions associated with the gas network operators in the Draft Work Programme:</p> <p><b>Strategic Objective 2</b>  <b>Ref 6: Scope post implementation issues applicable to biomethane injection</b>  GNI (UK) welcomes the proposal to review the connection policy, potential code and licence modifications, with a view to facilitating the delivery of renewable gas in line with energy policy and emerging interest in biomethane production and injection. We share your commitment to ensuring that the regulatory framework is in place for shippers to have the ability to avail of biomethane injection and will continue to work with all key stakeholders in this regard.</p> <p><b>Strategic Objective 2</b>  <b>Ref 7: Assess the impact on gas transmission arrangements of projected demand for gas</b>  With the projected demand for gas increasing and the need to maintain network resilience, GNI (UK) supports the ambition of this project which aims to ensure that the gas transmission system can cope with new gas fired electricity generation. GNI (UK) will continue to work with our partners to assess the impact on the gas transmission arrangements to ensure optimum use of the network and enhance security of supply.</p> <p><b>Strategic Objective 3</b>  <b>Ref 2: Work with DfE on the implementation of energy strategy to help deliver net zero</b></p>

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		<p>GNI (UK) is committed to working with UR, DfE, TSOs and DSOs in relation to the Northern Ireland energy strategy. GNI (UK) fully supports the ambition to implement a revised long-term framework for energy in Northern Ireland which considers the needs of consumers, progresses the delivery of net zero and facilitates security of supply at an affordable price. We look forward to close cooperation with our partners, and, through the efforts of our dedicated GNI (UK) NI Energy Transition Manager, to collaborating fully on steps towards the decarbonisation of the gas network.</p> <p><b>Strategic Objective 3</b>  <b>Ref 5: Establish enhanced monitoring arrangements for security of supply in Northern Ireland (electricity and gas)</b>  GNI (UK) recognises the importance of ensuring security of supply and a low carbon future and will continue to work closely with all stakeholders involved to achieve the ambition of enhancing operational effectiveness in mitigating any potential security of supply concerns.</p> <p><b>Strategic Objective 3</b>  <b>Ref 10: Complete an exit review for gas</b>  GNI (UK) welcomes the proposal to complete an exit review for gas, noting the ambition of creating a level playing field for gas generators in the SEM and potential benefits for customers and we will engage with all our partners to secure a successful outcome to this process.</p> <p>In conclusion, GNI (UK) recognises the importance of a number of key elements in the <b>Draft Forward Work Programme 2023-2024</b> and remains supportive in particular, of the focus around the implementation of the energy strategy in Northern Ireland; the protection of consumers; the decarbonisation of the network and delivery of net zero; whilst, ensuring security of supply. We look forward to working closely with you and all stakeholders involved to best achieve these ambitions and will be in touch separately in relation to the resourcing and allowance required to effectively deliver the Northern Ireland Energy Strategy.</p>
10	NEA	<p>NEA welcome the opportunity to respond to the Utility Regulator's (UR) Draft Forward Work Programme (FWP) 2023-2024. NEA work closely with the UR across many aspects of our work, but especially in relation to consumer protection and policy development. We value the strong working relationship we have developed and look forward to continuing to work together in the coming years as we strive to eradicate fuel poverty in Northern Ireland.</p> <p>In responding to this consultation, it is important that we reflect on the context of the past 18 months which have been some of the most difficult for energy consumers and in particular, vulnerable households, who have been faced with soaring prices and little in the way of government support when compared to other regions of the UK. The increase in energy bills along with rising food prices and high levels of inflation have deepened the levels of hardship facing households in NI, pushing many more people into fuel poverty. In June 2022, research carried out by NEA and LucidTalk found that 45% of NI households were spending more than 10% of their income on energy and are therefore living in fuel poverty. Along with this, there has been a rise in dangerous 'coping' mechanisms as households look to manage rising costs on ever tightening budgets. 80% of NI homes have admitted to rationing the use of their central heating in an effort to</p>

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		<p>reduce costs, and 1 in 10 households admitted to skipping meals in order to ensure they had enough money to pay for their energy. These behaviours put households at a significant increased risk of detrimental impacts on their health and wellbeing.</p> <p>NEA have experienced the human impact of the energy crisis first hand through our 'Warm and Well' project and our discretionary support fund. Both of which have been called upon to provide crisis intervention to more than double the number of households we would support in a normal winter period. The pressure facing our communities must not be underestimated. Without a real and concerted effort from all stakeholders in the NI energy system these problems will only continue to mount up, and it will be vulnerable members of our society that are impacted the most. NEA broadly agree with the context that the paper outlines and we believe the projects identified are required. We have made some comments around the objectives in the Draft FWP and have included some suggestions which we feel are worthy of consideration and may enhance the Forward Work Programme 2023–24.</p> <p>In general, NEA believe there is a need to ensure that existing consumer protections (across all utilities) are maintained and strengthened. In comparison to other countries, NI has a very small retail market and therefore does not benefit from economies of scale. For this reason, we consider that it is unlikely to attract enough suppliers for competition alone to form the basis of consumer protection. Therefore, we consider that the best way to protect domestic consumers (and in particular those who may be vulnerable) is to maintain high standards of regulation, including price controls on the biggest supplier. Crucially we believe that where new technologies and markets emerge, regulations should be updated to ensure there are no gaps or unintended consequences for consumers. NEA will continue to urge the Department for the Economy (DfE) to work with the UR, the Consumer Council and wider stakeholders to identify and plug any 'gaps' in consumer protections that emerge as the energy system changes. The uptake of low carbon heat solutions will require changes to consumer's heating systems in their homes, which may impact on comfort factors or the responsiveness of the system. Consumers will also be required to change their behaviours, including using less energy and adopting more energy efficient lifestyles. It is our belief that all households in NI will need support to decarbonise, but it is of paramount importance that those considered the most vulnerable are supported first and foremost and the UR can and should play a significant role in ensuring this process.</p> <p>The transition to decarbonisation represents a significant change in energy policy in NI, and it will mean that consumers will be required to change how they heat and power their homes. This will be a challenging journey for many households as they will be required to learn new skills and adopt new behaviours to make efficient use of emerging technologies. To support this change provisions will be required to make the transition as simple as possible for energy users. This means it is important to provide clear information, advice, and support for all and we believe the UR will have an important role to play in ensuring this is the case.</p> <p>NEA believe that energy efficiency should be considered the 'first fuel'. We know that energy efficiency improvements offer a tried and tested, cost-effective approach to reducing household energy consumption, whilst also alleviating the hardships</p>

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		<p>on fuel poor households and contributing to ensuring warm, safe, and healthy homes. The emerging low carbon technologies will not offer affordable energy for many households in NI without widespread energy efficiency improvements. Fixing NI's cold, damp and leaky homes will therefore be imperative if we are to ensure a 'just transition'. Doing so will assist in unlocking several wider social and economic benefits, lifting households out of fuel poverty, reducing the burden on the NHS and freeing up household incomes which can be reinvested in their local communities.</p> <p>At this point, we wish to reiterate the importance of programmes such as the Northern Ireland Sustainable Energy Programme (NISEP) in addressing fuel poverty in the longer term. NEA's Energy Justice Campaign (EJC) has worked persistently to highlight the importance that the NISEP continues to play as a key intervention in improving energy efficiency, particularly in vulnerable households. We therefore consider it a matter of priority that further information be provided on the plans for the existing NISEP. The support the programme provides to vulnerable households cannot be underestimated and as such we reiterate our call to keep the NISEP in place until such times as an alternative scheme is developed.</p> <p>NEA would also like to see further efforts to obtain more detailed information and data around vulnerable consumers' use of pre-payment meters (PPM) and the levels of self-disconnection in NI. With currently 45% PPM customers in the electricity market, 62% in Gas Greater Belfast and 82% in Gas Ten Towns, we believe there is a need for further exploration into the range of aspects of coping with a PPM. To date we still don't have enough information to adequately assess the degree of self-disconnection, rationing, consumer behaviour, accessibility, ease of use, PayPoint issues and many other aspects. This project should also look at other programmes to tackle debt such as through extending the use of Fuel Direct.</p> <p>Below we outline some additional points which we believe deserve consideration by the NI Executive, the Department for Communities (DfC) and the UR. It is our belief that these options will assist in easing the pressures on vulnerable energy consumers in NI in the longer term, and we would like to see them reflected in some way within the FWP.</p> <p><b>• Consideration should be given to the Introduction of the Warm Home Discount (WHD) scheme (or equivalent) in NI.</b> The WHD provides for mandatory social price support to reduce energy bills for the most vulnerable. Qualifying households in GB receive a £150 discount on their electricity bill between October and March. Each year the scheme supports 2 million homes, helping more than 600,000 poorer pensioners<sup>7</sup>. Currently vulnerable households in NI do not receive this support.</p> <p><b>The UR should carry out a review of the current system of regulation in NI and assess how this compares with the protections provided by the Energy Price CAP in GB.</b> The price cap sets a limit to how much energy firms can charge customers for gas and electricity and was introduced in 2019 to help households who do not regularly switch suppliers. Ofgem, the energy regulator, determines the level of the cap four times a year, and it is adjusted in April, July, October and January. Crucially this means price rises are passed through to consumers at set periods, meaning consumers have more time to prepare and react. In contrast, in NI we have seen a rapid rise in energy prices throughout the winter months. This</p>

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		<p>has meant many consumers have been caught unaware and faced extended hardship this winter. This is yet another example of households in NI being further disadvantaged in comparison to their GB counterparts, as they cannot avail of the additional protections provided by the price cap.</p> <p>• <b>Implement a new social tariff to help make energy more affordable for a discrete and well-defined set of energy customers.</b> In the 2000s, the UK Government and Ofgem introduced voluntary social tariffs in the energy sector as a form of 'social price support' for vulnerable consumers. This represented an attempt by Government to protect the poorest consumers from fuel price rises without the need to interfere in the market or invest excessive amounts of public money. This will now be a crucial intervention to ensure that energy is affordable for the most vulnerable. Finally, we welcome the continued work of the Consumer Protection Advisory Group and look forward to the partnership opportunity this provides NEA and others to provide advocacy for consumers and liaise with industry. We thank you for the opportunity to respond to you with these comments. NEA value the working relationship we have developed with the UR, and we look forward to continuing to work together in the coming years as we strive to eradicate fuel poverty in NI.</p>
11	COPNI	<p>COPNI appreciates the opportunity to respond to the consultation on the Draft Forward Work Plan (FWP). COPNI broadly agrees and welcomes the proposed projects and strategic aims but would like to make some further suggestions and comments for your consideration. These are detailed below and based on the strategic objectives as listed in the consultation document.</p> <p><b>Strategic objective 1: Promoting markets that deliver effective competition, informed choice, and fair outcomes.</b></p> <p><b>Project 2: Introduce guaranteed service standards for electricity.</b></p> <p>COPNI welcomes this proposal and would like to see the implementation of the previously proposed targets of 97% for customer correspondence and customer complaints to be responded to within ten working days for all providers in line with current overall standards for gas<sup>1,2</sup>. COPNI would also like to see these targets incorporated into guaranteed standards of service, and for these to be monitored and published for individual suppliers.</p> <p>COPNI would also like to see targets for the uptake of Customer and Medical Care Registers across all utility providers, with performance levels and numbers of those on registers published within a regulatory framework to encourage and improve uptake.</p> <p>The recent implementation of the Consumer Energy Charter has been a very encouraging development and demonstrates the UREG and energy companies' commitment to addressing the needs of vulnerable customers. COPNI particularly welcomes the principle that suppliers will ensure that customers on care registers are not moved on to prepayment meters unless requested by the customer. COPNI would suggest that suppliers undertake an annual satisfaction survey with prepayment meter customers to assess the adequacy of the provision in meeting the needs of older customers or those with disabilities and how the service can be improved for those customers with complex needs.</p> <p><b>Suggested Project Area: Cost of Living and Fuel Poverty</b></p>

No.	Organisation	Response
		<p>The most recent official figure for fuel poverty in NI was measured by the 2016 Housing Condition Survey at 22%<sup>3</sup>. However, research commissioned by NEA, and published in November 2022, found that 45% of NI households were in fuel poverty<sup>4</sup>. COPNI would encourage the UREG to include a specific project within its FWP to investigate ways of addressing the increasing cost of living and rates of fuel poverty. COPNI is aware that the Department for Communities (DfC) is in the process of working on a new fuel poverty strategy and that UREG will be a key stakeholder in this. This project could include measures such as social tariffs, promoting awareness of the benefit of switching suppliers, and other potential actions.</p> <p><b>Strategic objective 2: Enabling 21st-century networks:</b></p> <p><b>Project 5:</b> Assist DfE in scoping the future work associated with Smart Meters including a review of electricity tariff structures - to include consideration of smart metering. Ensures the structure of tariffs remain appropriate for network industries and customers considering the energy transition.</p> <p><b>Project 6:</b> To facilitate delivery of renewable gas in line with developing energy policy and emerging interest in biomethane injection. This will involve review of connections policy and potential code and licence modifications.</p> <p><b>Project 7:</b> Assess the impact on gas transmission arrangements of projected demand for gas. Ensures the gas transmission system can cope with new gas fired electricity generation and will enhance electricity security of supply and facilitate increases gas demand.</p> <p><b>Project 8:</b> Commence a review of electricity connections cost allocation. Consider appropriate allocation of costs and facilitate the energy transition that delivers the net zero targets at lowest cost and ensures that those who benefit from a connection pay an appropriate charge.</p> <p>COPNI recognises the importance of the short and long-term benefits of the above-listed projects, however would ask that with all projects, where possible, the implementation costs are not borne by consumers. Whilst wholesale prices and other external factors have in some cases placed unprecedented pressure on suppliers, generators, and network operators it is for the most part consumers who have paid the cost for these factors, whilst most suppliers and generators have seen an increase in profits over the last few years. This is a dynamic that needs to be challenged at a regulatory and policy level.</p> <p><b>Strategic objective 3: Ensuring the security of supply and a low carbon future.</b></p> <p><b>Project 2: Work with DfE on the implementation of the energy strategy to help deliver net-zero.</b></p> <p>COPNI will respond in more detail on the elements of this project in the current consultation on protecting consumers during the energy transition to net zero. As with all such projects, COPNI would encourage that consumers be protected from the costs associated with this project.</p> <p><b>Project 4: Administer NISEP and work with DfE on the future of energy efficiency provision and renewables for Northern Ireland.</b></p> <p>COPNI fully supports the Northern Ireland Sustainable Energy Programme (NISEP) and its contribution to reducing fuel poverty and increasing energy efficiency in homes. Given the current increase in energy costs, the cost-of-living crisis, and increased rates of fuel poverty; COPNI would advise that eligibility for all schemes should be based on income and the</p>

STAKEHOLDER RESPONSES VIA EMAIL

No.	Organisation	Response
		<p>thermal efficiency levels of homes, to ensure that those most in need receive this assistance<sup>5</sup>. Additionally, COPNI would ask that consideration be given to reducing the number of scheme operators as means of reducing administration costs and free up further funds to provide more interventions. The targeting of schemes in areas with greater socio - economic needs should also be considered.</p> <p><b>Project 10: Complete an exit review for gas.</b></p> <p>COPNI has reviewed the available documentation on the UREG website<sup>6</sup> and has found that the information on these charges and their impact on overall energy charges may not be clearly understood by consumers or stakeholders not directly involved in the industry. As part of its published work plan, COPNI would encourage UREG to include an explanation of these charges and how they relate to, and are incorporated into the overall charges to consumers, and what potential benefits or impacts any review may have.</p> <p><b>Organisational Projects:</b></p> <p>COPNI is encouraged by and welcomes the listed projects under this category including improvements to communications and call handling. COPNI would ask the UREG to be mindful of ensuring that any policies or consultation documents are accessible and are drafted to ensure that regulatory matters are communicated in a way that is easy to understand for both stakeholders and consumers so that they can be encouraged to make informed responses and are empowered to contribute to public consultations and calls for evidence.</p>

STAKEHOLDER RESPONSES RECEIVED VIA CITIZENSPACE

No.	Respondee	Have we prioritised the right projects?	Any objections to our proposed projects?	Any other comments
1	<b>Centre for Sustainable Technologies, Ulster University</b>	No	No	Public Electric Vehicle (EV) charging stations are becoming public burden: stations deployed without statutory requirements on availability. As this trend continues, consumers are not able to use EV for long distance travels within and across border regions and are not able to get the full value of switching to EV. And public EV charging stations continue to let people down and prevent the decarbonisation of a sector that is responsible for about 20% (4210.36 kt CO <sub>2</sub> e) of the total NI emissions (2019) Standards on public EV charging infrastructure and electricity connection should be prioritised. The Utility Regulator should work with the Department for Infrastructure and the Department for the Economy to regulate how public EV charging stations are deployed and address the concerns raised on the availability of public EV charging stations as detailed in [4].
2	<b>Seopa (owners of CompareNI.com)</b>	No	No	There is an urgent need for increased switching in the market for electricity consumers. CompareNI.com have the knowledge, experience, and media budget to make meaningful change to this market. The current regulations (Marketing Code of Practice) does not help consumers make meaningful comparisons as it prevents annual cost compression (which both OFGEM and CRU mandate). On 28th July you stated that you would review this in the next 18-24 months, yet this is absent from your FWP.
3	<b>SONI Ltd</b>	Yes	No	SONI welcomes the opportunity to respond to the consultation on the Utility Regulator's draft Forward Work Plan for 2023-2024. SONI is the electricity transmission system operator for Northern Ireland. We are responding to the Utility Regulator's consultation on its Forward Work Plan in the context of our key roles of planning and operating the electricity transmission system and operating the markets for wholesale electricity, system services and capacity. These roles mean we plan for the future of the electricity transmission grid and operate it every minute of every day. This includes interconnection to neighbouring grids and running the wholesale electricity market. We ensure that everyone has power when they need it at the most economic price possible. SONI has a pivotal role to play in the implementation of Northern Ireland's new energy strategy and obligations under the climate change act, in particular, to achieving at least 80% of our electricity from renewable sources by 2030, an important step on the journey to net-zero carbon emissions by 2050. We believe this is achievable if industry, government, the



RESPONSES RECEIVED VIA CITIZENSPACE

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				<p>regulator, communities, and landowners collaborate to make it happen.</p> <p>While SONI has a unique role to play in delivering Northern Ireland’s low carbon future, we are also responsible for security of supply for consumers. We manage the balance between supply and demand on a second-by-second basis and model medium- and long-term adequacy in order to prepare industry and the market for what will be required to keep the lights on.</p> <p>SONI agrees with the proposed list of projects in the draft FWP. We have commented specifically on those projects where we expect to have an active role in supporting the UR in delivery of these initiatives.</p> <p>Strategic objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes</p> <p>Project 4 - Implement new arrangements for ancillary services:            FASS will deliver a system services market that is consistent with the European target market and which will allow NI consumers to benefit from wider competition in the system services market. These arrangements will also provide investment signals that should support the delivery of the renewables target for Northern Ireland. This project is therefore essential for compliance, attracting necessary investment and ensuring a just transition. It is vital that sufficient resources are provided at all levels in the UR, appropriate governance arrangements are in place for this major programme and that SONI is also provided with the resources necessary to ensure it is able to implement the SEMC decision in an efficient and timely manner.</p> <p>Strategic objective 2: Enabling 21st century networks</p> <p>Project 1 - Develop a digitalisation strategy for the electricity networks:            SONI currently publishes a significant volume of system and market data across both the SONI and SEMO websites. SONI looks forward to working with the UR and NIE Networks to enhance the data available to stakeholders and simplify access. SONI would emphasise that the approach should align with the NI Energy strategy requirements in relation to data and digitalisation to ensure that the whole of the energy supply system is assessed and that the solution complements the delivery of the ‘one stop shop’. SONI considers that this can be achieved through engagement with a wider range of stakeholders. SONI has been actively</p>

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				<p>working with NIE Networks to consider areas of collaboration and data sharing. SONI seeks clarity in terms of the timeframes for consultation on licence modifications. This will allow us to factor in this work area into our work plans and resource plans. We would welcome engagement with the UR ahead of any consultation to understand the requirements in more detail in order that SONI can plan our resources appropriately in order to support the UR as required.</p> <p>Project 4 - Complete the NIE Network RP7 price control review: This price control will be an important enabler of the delivery of the NI Energy Strategy and the Climate Action Plan for Northern Ireland. This price control has the potential to unlock opportunities for the industry and benefits for consumers. It is vital that stakeholders are provided with sufficient time to understand and respond to the UR's proposals while ensuring that all formal processes are completed before the start of the new period. SONI has and will continue to collaborate with NIE Networks across the various aspects of the RP7 price control.</p> <p>Project 5 - Assist DfE in scoping the future work associated with Smart Meters including review of electricity tariff structures: SONI has been supporting DfE in its development of the CBA for smart meters. We look forward to continuing to support DfE and the UR in this important area. SONI requests further clarity on the scope and timeframes for the review of tariff structures. It is unclear if there is a dependency on a decision on whether smart meters are to be deployed in Northern Ireland.</p> <p>Project 7 - Assess the impact on gas transmission arrangements of projected demand for gas: SONI is available to support this workstream. We consider it is important that the Electricity TSO and Gas TSOs work closely together. Consideration should be given to whether updates are needed to the respective licences in terms of information sharing between the various TSOs. SONI would welcome clarity in terms of the scope, priorities and timescales for this workstream in the final forward work plan.</p> <p>Project 8 - Commence a review of electricity connections cost allocation: SONI is unclear on the scope of this work area. It is unclear if the scope includes distribution and transmission and whether the current SEM related arrangements are in scope.</p>

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				<p>SONI would welcome clarity in terms of the scope, priorities and timescales for this workstream in the final forward work plan in order that SONI can plan our resources appropriately in order to support the UR as required.</p> <p>Project 9 - Commence preparatory work for SONI TSO 2025-2030 price control: SONI is keen to engage with the UR on the TSO 2025-2030 Price Control in 2023. It is important that specific milestones are set and agreed for this project. SONI welcomes the inclusion of the preparatory work on the 2025 - 2030 price control. Engagement will be an important aspect of this project and we welcome further discussion.</p> <p>Strategic objective 3: Ensuring security of supply and a low carbon future</p> <p>Project 1 - Deliver SEM capacity auctions in line with programme: SONI is working closely with UR and will continue to do so. We are dependent on UR decisions in this area to allow us to fulfil our obligations under licence and the capacity market code. It is important that the future capacity auctions deliver a diverse range of technologies to meet the needs of a modern 21st century safe, secure, efficient and reliable system with increasing levels of renewable generation whilst protecting the interests of consumers.</p> <p>Project 2 - Work with DfE on the implementation of energy strategy to help deliver net zero: The UR plays a pivotal role within the energy industry in Northern Ireland, and it is vital that it has sufficient resources to contribute towards the decarbonisation of our energy system. A more refined timeline and potential activities would be beneficial here so that SONI and other stakeholders can plan for potential engagements and deliverables due</p> <p>Project 5 - Establish enhanced monitoring arrangements for security of supply in Northern Ireland (electricity and gas): SONI is working closely with UR to ensure that the electricity aspects of security of supply are quantified and that mitigations are facilitated. As the energy transition progresses, this work will need to include the system services that are essential to ensure stability of the system as well as the MW supply/demand balance. We support the work that is commencing to align the monitoring of gas and electricity issues and look forward to continuing to play our part in this process.</p> <p>Project 6 - Commence a review of interconnector policy development: SONI would welcome engagement in this programme of work and would be interested to</p>

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No.	Respondee	Have we prioritised the right projects?	Any objections to our proposed projects?	Any other comments
				<p>understand the full scope of the work to be undertaken and associated timeframes. We previously conducted a consultation process on the connections policy with regards to interconnection and would be keen to remain involved in discussions on this area to assist us in planning any future changes to our own policies.</p> <p>Project 7 - Work with DfE to scope out regulatory framework to facilitate offshore wind connections: SONI is actively working with UR and DfE to establish a framework for connecting offshore generation in NI. These connections have a long lead time and substantial work will be required onshore to facilitate them. SONI would urge the UR to ensure that adequate resources at all levels in the UR structure are allocated to this workstream, because the timelines for delivery are extremely challenging</p> <p>Project 8 - Facilitate regulatory framework for flexible technologies in Northern Ireland: SONI would welcome engagement in this programme of work and would be interested to understand the full scope of the work to be undertaken and associated timeframes.</p> <p>Project 9 - Develop and implement improvements to the SEM capacity market: SONI would welcome engagement in this programme of work and would be interested to understand the full scope of the work to be undertaken and associated timeframes</p> <p>Project 10 - Complete an exit review for gas: SONI agrees with this workstream. As TSO, we consider that we will need to work with the Gas TSOs more closely going forward and to share information. This may need licence modifications to enable this engagement fully.</p> <p>Organisational Projects</p> <p>Project 1 - Work with DfE and stakeholders to review the appropriateness of our vires in light of the energy strategy and climate change legislation: SONI welcomes the review of the UR's vires, while noting the impact that the current absence of an executive and the scheduled election might have on the ability of the UR and DfE to deliver this legislative update. Therefore, in the meantime we would encourage the UR to provide clarity around how it has regard to its current duties in relation to innovation and sustainability when making its decisions. This will help to ensure that progress can be made</p>

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				<p>towards decarbonisation targets in the short to medium term. A more detailed timeline and an idea of the end deliverables would be most helpful in understanding the scale of the programmes of work, and the time required. This would also assist SONI when it comes to preparation of the SONI FWP 2023-2024.</p>
4	GNI (UK)	Not answered	No	<b>TO NOTE THAT GNI ALSO PROVIDED THE SAME RESPONSE VIA EMAIL (SEE ABOVE)</b>
5	firmus energy	Yes	Yes	<p>firmus energy welcomes the opportunity to respond to the Utility Regulator’s Forward Work Programme consultation. firmus energy is committed to working with the Utility Regulator, Department for the Economy (DfE), the Consumer Council for Northern Ireland and other stakeholders to ensure customers are at the heart of our activities of distributing and supplying gas across Northern Ireland. We recognise working collaboratively is the most effective way to promote the role our gas distribution infrastructure currently plays in delivering the benefits of gas across Northern Ireland networks while also developing the fundamental part our network will have in delivering DfE’s Energy Strategy.</p> <p>We appreciate the visibility that the Forward Work Programme provides and our opportunity to feed into it. In our response we have directly referenced the programme points we believe are appropriate for firmus energy as a Distribution Network Operator and Gas Supplier with a commitment to supporting the Northern Ireland transition to net zero carbon.</p> <p><b>Business Plan and Resources</b></p> <p>We appreciate that the Utility Regulator is striving to be agile and sufficiently resourced in order to reflect the evolving strategic landscape in Northern Ireland and support DfE in the Energy Strategy. firmus energy welcome the prospect of a less prescriptive, more pragmatic approach to Utility Regulation. The Utility Regulator must, however, be mindful that suppliers do not have the same agile resourcing capabilities or the equivalent additional resource that the Utility Regulator intend to employ. Suppliers have been under increasing pressures from the additional workload caused by the energy crisis. Significantly increased levels of customer contact, volatile commodity markets resulting in multiple tariff changes and administration of government support schemes have stretched existing resources. Ongoing administration of government EPG and EBRS schemes are resource intensive, and the Utility Regulator must recognise the strains these place on supply companies and the additional complexity they</p>

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No.	Respondee	Have we prioritised the right projects?	Any objections to our proposed projects?	Any other comments
				<p>bring to internal processes and regulatory reporting. firmus energy would welcome greater Utility Regulator engagement on the ongoing administration of government support schemes, recognising the additional pressures the schemes place on energy companies and effective customer service delivery and supporting suppliers in communicating with BEIS the pressures and nuances specific to the Northern Ireland Market.</p> <p>As the Utility Regulator workforce increases and facilitates proactive pursuit of the projects detailed in the Forward Work Programme, care must be taken to ensure stakeholders are given time and opportunity to also ensure resource is trained and available, particularly as new and enhanced market monitoring has been identified as a key outcome for the Corporate Strategy. The Utility Regulator has stipulated prioritisation of resources to ensure targeting critical projects, this prioritisation must consider limitations industry face to ensure resources are prioritised to maximise customer service delivery. To this end, firmus energy appreciates the Utility Regulator pledge to further improve regulatory processes and communications with stakeholders. firmus energy would welcome details of the new Utility Regulator organisational structure, roles and responsibilities as soon as practicable along with more specific and regularly updated timelines for key deliverables in 2023/24. It would be beneficial to all parties if the Business Plan Projects in the Forward Work Programme gave anticipated times frames for interactions with stakeholders to facilitate planning.</p> <p><b>Business Plan Projects</b></p> <p>The challenges caused by the current cost of living crisis continue to be realised across the energy industry. While wholesale gas prices have softened over recent months, it will take time for these prices to significantly filter through to tariffs and consumers will continue to feel the impact of high energy prices as government support schemes reduce. We therefore appreciate review of the Consumer Protection Programme to further safeguard customers, particularly the vulnerable. Customer service continues to be at the heart of our activities, with the protection of vulnerable customers remaining a top priority and we are committed to continue to work with Utility Regulator both on the Consumer Protection Programme and in finalising the Best Practice Framework.</p> <p>firmus energy is pleased to note the role the Utility Regulator intend to take in assisting DfE scope the future of Smart Meters in Northern Ireland. We would stress the urgency of this</p>

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				<p>engagement due to the pressing need for a new gas (prepayment) metering solution. While the recent cost benefit analysis carried out by KPMG on behalf of DfE clearly favours Smart Meters, the lack of clear definition of what constitutes Smart is causing uncertainty at a stage when DNOs and Suppliers have already invested significant time and resource on a new gas metering solution. The New Metering Solutions project needs to progress as soon as possible, and Utility Regulator can be instrumental in supporting industry in future proofing solutions and funding considerations.</p> <p>Furthermore, the GD23 final determination acknowledges the possible transfer of responsibility for meter reading from supply companies to DNOs and the need for this to be aligned with future metering solutions. firmus energy notes that the Forward Work Programme does not make specific reference to this transfer of meter reading responsibility, and a project of this scale will require significant input from all stakeholders and therefore should be reflected within the Utility Regulator's project plans.</p> <p>As a gas DNO and supplier, firmus energy is confident in the role the gas network can play in transitioning to a low carbon infrastructure and it is crucial that energy policy and regulation strategy is shaped to facilitate growth in the biomethane market. Focus to date has been on facilitating Biomethane injection into the gas Distribution networks and the scope in the Draft Forward Work Programme appears to remain so. Attention should also now turn to developing policy, infrastructure and regulatory framework to leverage the benefits of locally produced biomethane for Northern Ireland consumers. A transition to a net zero energy system has the potential to be a key factor in helping address affordability and security of supply concerns if made suitably available to consumers. We would like to see a structure in place for Northern Ireland consumers to realise the green benefits from locally produced Biomethane, as currently virtual reverse flow options to G.B. may be more attractive to producers and therefore benefit other jurisdictions' progress towards decarbonisation targets. We believe the Utility Regulator can play a part in facilitating this.</p> <p>firmus energy note the inclusion of assessing the impact on gas transmission arrangements of projected demand for gas. While we understand this workstream has arisen because of new power generation, it will impact all transmission shippers. We are therefore keen to understand further detail on the scope of this project and, in particular, the cost implications</p>

RESPONSES RECEIVED VIA CITIZENSPACE

No.	Respondee	Have we prioritised the right projects?	Any objections to our proposed projects?	Any other comments
				<p>for current and future gas consumers.</p> <p>Enhanced monitoring arrangements for gas security of supply is a welcome addition to the forward work programme. Recent shocks in the gas market with corresponding spikes in prices highlight this focus is required. Future gas policy is an area that requires a key focus, and it is important that the Utility Regulator, networks and shippers continue to work together to deliver this in a timely and efficient manner.</p> <p>While firmus energy is supportive of the projects proposed by the Utility Regulator, we believe more consideration is required in some areas, which perhaps need more focus in the Forward Work Programme. There is no specific reference to hydrogen in the strategic objectives. Implementation of the Energy Strategy, to help deliver net zero, has been defined as a key focus area within the Programme and hydrogen is seen as a vital part of the overall Energy Strategy. firmus energy believe this omission should be addressed. The industry is at a critical stage in defining the role hydrogen may play in the future energy transition and it is essential to identify and overcome any existing regulatory barriers to hydrogen development. We understand the Utility Regulator's participation in hydrogen innovation has been somewhat limited by current vires and to that end we welcome constructive engagement between the Utility Regulator and DfE to ensure the Utility Regulator's vires is appropriate to deliver Energy Strategy and climate change legislation and to identify effective changes to the existing regulatory framework to support the development of hydrogen technology.</p> <p>As delivery of the Energy Strategy progresses, firmus energy request DfE and the Utility Regulator work together to ensure a holistic approach to delivering decarbonised solutions. Care must be taken that one industry is not promoted in favour of others in the transition to net zero. Solutions that continue to promote connections to, and safeguards the future of, the gas network will leverage existing infrastructure and provide more affordable options for consumers. The continued growth of the gas network will ensure cost stability and could be the perfect conduit for renewable gases.</p> <p>Conclusion</p> <p>The challenges the gas industry has faced over the last few years reinforce the importance of robust core business activities and careful forward planning. firmus energy are committed to continued engagement with the Utility Regulator to ensure we continue to operate and</p>



RESPONSES RECEIVED VIA CITIZENSPACE

<b>No.</b>	<b>Respondee</b>	<b>Have we prioritised the right projects?</b>	<b>Any objections to our proposed projects?</b>	<b>Any other comments</b>
				provide outstanding customer service to our c.100k customers across Northern Ireland during these difficult times for consumers. We are dedicated to supporting the Northern Ireland Energy Strategy objective of achieving net zero carbon by 2050 and will continue to support the Utility Regulator in progressing this through the Forward Work Programme.