

Phoenix Energy's response to the Utility Regulator's Draft Forward Work Programme 2025/2026

Phoenix Energy¹ welcomes the opportunity to respond to the Utility Regulator's (UR) consultation on its "Draft Forward Work Programme 2025/2026".

We look forward to working with UR over the coming year to ensure delivery of the Forward Work Programme (FWP) projects and are happy to meet with UR to discuss any queries raised following this response.

As with UR's 2024/2025 FWP, this year's FWP is ambitious but necessary in the move to a net-carbon zero strategy. Whilst UR's own resources have risen significantly, the overall resources available to Phoenix Energy has remained reasonably static and we welcome ongoing engagement with UR on how industry is resourced to match the pace with which UR intends to deliver upon its key targets for 2025/2026.

Our specific comments on UR's draft FWP projects are detailed below.

Strategic objective 1

We all have a part to play in moving to a net-carbon zero society and in doing so ensure that current and future consumers are supported and protected through the transition. Phoenix Energy therefore welcomes the projects proposed by UR for 2025/2026. We particularly welcome the project that will be undertaken by the Markets and Networks and Energy Futures Directorates to assess the desirability and feasibility of developing a Northern Ireland energy system model. It is critical that this model includes the now clearly accepted role of the gas networks in delivery of the energy transition. We are therefore keen to work with UR on the development of the model and recommend that this project is developed through collaboration with industry. For gas, the established Gas Network Strategy Working Group may be an appropriate vehicle to accomplish this.

Strategic objective 3 and 4

Use of appropriate regulatory frameworks and other properly defined consumer protections will be critical going forward as consumers embrace a changing energy landscape, to ensure that the fair and cost-effective outcomes they have come to expect from NI's regulated utilities are maintained or enhanced.

¹ Phoenix Energy Group Ltd is trading as Phoenix Energy

- We welcome the ongoing engagement with UR on the price control framework both for GD23 and for the next GD29 review and specifically the projects that will be undertaken by the Price Controls Directorate to publish initial findings and/or decisions and/or next steps for priority workstreams relating to:
 - future gas network price control regulation strategic issues
 - GD29 Tax treatment, and
 - GD23 Revenue Recovery timing.

We note the timescales for these workstreams are Quarter 4 and would welcome ongoing engagement with UR to ensure that the outcomes of the GD23 Revenue Recovery timing project in particular may be considered when setting our network charges for 2026.

- Phoenix Energy is passionate about delivering the best possible standards of service for all consumers. That means taking the time to understand and cater for different consumer needs and often bespoke solutions specific to a consumer's circumstances on a case-by-case basis. We continually look at ways to improve and adjust our services to ensure positive outcomes for all consumers and we particularly look forward to continuing to support the projects that will be undertaken by the Consumer Protection and Enforcement Directorate to deliver upon UR's Best Practice Framework project for electricity, gas, and water.