

Number	Additional Information	Consultee	Comments
1	What digitalisation consumer benefits (including energy system data sharing) should and can be delivered over the following time frames a) today b) over the next 6 years and c) longer term to deliver net zero and related targets?	Consumer Council	Whilst we cannot comment on delivery time frames, our view is that digitalisation consumer benefits should include the following: <ul style="list-style-type: none"> • support vulnerable consumers (particularly those marginalised from energy efficiency advice). • improve the consumer experience when seeking to connect energy-intensive devices such as electric vehicles or heat pumps and deliver a positive cost benefit.
1	What digitalisation consumer benefits (including energy system data sharing) should and can be delivered over the following time frames a) today b) over the next 6 years and c) longer term to deliver net zero and related targets?	SONI	The Demand Response Network Code has established specific timeframes that need to be taken in account. In addition, consideration should be given to the NI Energy Strategy and associated action plans.
2	Are there best practice initiatives being delivered in other jurisdictions and industries which may be suitable for NI and if so, why?	SONI	There are several best practice initiatives being delivered in other jurisdiction and industries that could be suitable for NI, particularly in the context of network codes being implemented in Europe. Focusing on GB is of less relevance in this context, as the EU network codes do not apply there. While GB may have developed its own frameworks post Brexit, they may not align with the EU standards that NI is required to follow. Therefore, looking towards European practices allows for a more seamless integration with the network codes and provides a pathway that is more directly applicable to NI's regulatory environment
3	How should consumers receive their fair share of the benefits?	Consumer Council	Based on our most recent research many consumers are concerned about the scale of their energy bill, so would see most benefit through lower tariffs or support to reduce their overall consumption. Improved transparency of data, provided in an accessible format, could also be seen as a benefit, through providing information on alternative tariffs and/or energy savings advice. https://www.consumerCouncil.org.uk/research/northern-ireland-consumers-cost-living-pulse-survey-augustseptember-2024 The vast majority of respondents (94%) were concerned about home energy prices.

3	How should consumers receive their fair share of the benefits?	SONI	<p>Consumers should receive their fair share of benefits through various mechanisms that ensure both affordability and access to market efficiencies. SONI believe that consumers should benefit directly through prices in the energy, system services and capacity markets, as they become more efficient and competitive. This will help to pass on savings to consumers, ensuring they pay a fair price for their energy. Additionally the optimal use of subsidy funds can play a key role in reducing the cost burden on consumers by supporting the integration of renewable energy sources and ensuring a stable supply. This, in turn, contributes to lowering wholesale prices over time. To unlock further direct benefits, such as real-time energy saving and demand-side flexibility, smart meters and the involvement of aggregators are crucial. Smart meters will provide consumers with better insights into their energy usage and Aggregators can combine the flexibility of multiple customers to participate in energy markets. This way, consumers can be active participants in the energy transition.</p>
4	How can we ensure that digitalisation delivers benefits for consumers as opposed to solely for market participants and shareholders?	Consumer Council	<p>The consultation focuses on digitalisation of system data, so we consider that NIE Networks and SONI will need to be clear which digitalisation initiatives will benefit consumers directly and those which will lead to benefits over a longer timescale through improved operational efficiency or reduction in constraints and justify the costs.</p>

4	How can we ensure that digitalisation delivers benefits for consumers as opposed to solely for market participants and shareholders?	SONI	To ensure that digitalisation delivers benefits directly to consumers, SONI consider that it is essential to recognise that suppliers and aggregators are the primary route to reaching consumers, and by definition they are market participants. Therefore, achieving consumer benefits relies on creating a market environment where these participants can operate efficiently and effectively. Inefficiencies arising from overlapping network codes and licence obligations could hinder the flow of benefits to consumers. A coordinated approach between network codes and licence requirements will ensure that the digitalisation process is seamless, allowing consumers to access the full range of potential benefits rather than seeing those benefits concentrated among market participants and shareholders.
4	How can we ensure that digitalisation delivers benefits for consumers as opposed to solely for market participants and shareholders?	NIE Networks	<p>NIE Networks has developed a robust RP7 plan designed to deliver capabilities and to ensure that the future electricity network will meet customer expectations, facilitate the energy transition, and maximise benefits and value for customers. Our RP7 business plan is designed to deliver meaningful outcomes for consumers. NIE Networks has a set of commitments for customers and stakeholders which include:</p> <ul style="list-style-type: none"> •Meeting the needs of our customers •Maintaining a safe, reliable and resilient network •Facilitating net zero through a flexible and integrated energy system •Preparing our business for the future <p>NIE Networks is focused on ensuring delivery to meet our RP7 commitments through both our individual initiatives or joint working arrangements with SONI. Our digitalisation initiatives will align to these commitments which will benefit consumers and all stakeholders, including market participants.</p>
5	How should NIE Networks and SONI be coordinating over these time frames to deliver these benefits?	SONI	Co-ordination should first be guided by the existing network code framework. The network codes provide a structured approach for harmonizing practices and standards across Europe, ensuring consistency in market operations, system operations and grid connections. Once the network code framework has been fully implemented, any remaining gaps or specific requirements unique to Northern Ireland can be addressed through adjustments in licensing arrangements.

6	What data do NIE Networks and SONI need to share with different stakeholder types to support consumer benefits over these time frames? How should the data be shared to benefit consumers?	Consumer Council	We have no comment on the data to be shared but stress the need for all data to be clear, simple and accessible. We believe it is important, particularly in a small market, that the requirement to pursue data and digitalisation is proportionate and targeted at actions that make a material, positive impact.
6	What data do NIE Networks and SONI need to share with different stakeholder types to support consumer benefits over these time frames? How should the data be shared to benefit consumers?	SONI	Network codes require a common platform that would require data to be shared with all participants operating in the market however small.
7	What barriers prevent delivery for stakeholders and consumers?	Consumer Council	We highlight communications as a potential barrier to raising consumer awareness, particularly for vulnerable consumers and/or those unwilling or unable to access the world of digital.
7	What barriers prevent delivery for stakeholders and consumers?	SONI	<p>The key barriers preventing delivery for stakeholders and consumers revolve around funding and regulatory uncertainty. Funding constraints will limit the ability of stakeholders and consumers to invest in necessary infrastructure upgrades, digitalisation, and innovation required for a more efficient and flexible energy system. Without sufficient financial resources, it becomes difficult for entities to deliver the full range of benefits to consumers.</p> <p>Additionally, inconsistent obligations and misalignment between regulatory frameworks creates confusion and operational challenges. The lack of coherence across obligations imposed on different market participants will lead to inefficiencies, duplicated effort and delays in delivery. This misalignment will hamper collaboration and complicate the integration of new technology, ultimately slowing progress towards decarbonisation. SONI consider that addressing these barriers is critical to ensuring that both stakeholders and consumers fully benefit from the evolving energy landscape.</p>
8	Are there any existing or developing standards in other parts of NI government or other NI industries with which the electricity network companies should harmonise or adopt?	SONI	SONI would reiterate that the framework defined by the DRNC should be the primary standards for the electricity network companies to adopt when it comes into effect. By adhering to this framework, SONI and NIE Networks can align their practices with the latest standards being implemented across Europe, facilitating integration, improving efficiency, and ultimately delivering better outcomes for consumers. This is based on our current understanding; however the reasons and effects are not clear.

N/A	NIE Networks and SONI Co-ordination Mechanism	NIE Networks	NIE Networks and SONI have existing joint working arrangements in place. The most appropriate arrangement for co-ordination and delivery of activities should be the joint Digitalisation Working Group. The meeting cadence and terms of reference of the Working Group will need to be reviewed to account for additional governance arrangements for approval of the Digitalisation Strategy and Action Plan. A joint governance board may also be required to oversee the approval of the joint Digitalisation Strategy.
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