



Power NI  
Woodchester House  
50 Newforge Lane  
Belfast  
BT9 5NW

[www.powerni.co.uk](http://www.powerni.co.uk)

John French  
Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6EB

19 February 2026

Dear John,

### **Draft Forward Work Programme 2026 – 2027**

Power NI welcomes the opportunity to respond to the recent draft Forward Work Programme (FWP) published by the Utility Regulator (UR). The 2026-2027 FWP is, as in previous years, an ambitious programme for work that contains several strategically important projects which will have a direct impact on Power NI:

- **Supporting the Just Transition to Net Zero**
  - **Smart Meter rollout**

Power NI have engaged with the UR and the Department over the last number of years with regards to smart metering, stressing the importance of consumers being at the heart of the roll out and the need to ensure that a different approach is taken compared to other jurisdictions, especially in relation to prepayment solutions. It is disappointing that the Smart Metering Project has yet to begin.

While smart meters are an enabler of many customer propositions which will support and facilitate the energy transition (tariffs and much more), suppliers will ultimately be the party who engages with the consumer on an ongoing basis. Suppliers will provide the customer facing innovation which will deliver the success of the smart metering objectives both in terms of take up and ultimately the behavioural shift required to meet net zero targets. This is over and above the

practical role suppliers will have in taking phone calls and dealing with queries once this roll out commences.

Given the size of this project, work cannot be done piecemeal or in isolation. An integrated, co-ordinated approach is required. Many organisations within Northern Ireland have experience of Smart Metering programmes in other jurisdictions and this experience can provide vital insight into successes and areas of difficulty. Power NI would urge the UR to ensure that suppliers remain a key stakeholder within any plan developed and remain committed to working with the UR to ensure the successful implementation and delivery of the Smart Metering Programme, given the significant impact on how suppliers will do business and interact with consumers in the future.

#### **- Electricity Time of Use (ToU) Tariffs and Dynamic Tariffs**

Power NI note the UR plan of taking a proactive approach in addressing TOU and dynamic tariffs. With the implementation of smart metering, the supplier role needs to focus on engaging consumers to maximise opportunities which can be done through the introduction of new tariffs facilitated by smart metering. It is important however that policy goals i.e. what outcomes are intended to be delivered via the tariff options, are understood from the outset. This will allow for appropriate design and delivery to take place.

It is also important to recognise that if 50 – 60% of the end rates are set by levies, Use of System and other 'pass-through' costs then the ability for suppliers to innovate around tariffs is extremely limited.

In previous FWP's the UR sought to review innovation within the NI energy retail markets and Power NI was encouraged to see the UR feel the need to adapt a more agile approach towards the new strategic landscape and path to Net Zero. It is unclear if this strategic objective has fallen away or is being consumed by the Smart Metering and Tariff work. It would be helpful if the UR could clarify that point.

Innovation within the retail market will be required in the Net Zero context. Electricity suppliers are well placed to deliver this as they 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. Power NI would encourage the UR to consider the changes Power NI will require to licencing provisions to enable the implementation of projects to support delivery of Net Zero and to progress changes to ensure policy and regulatory actions align.

- **Providing the highest level of consumer service and protection**

- **Consumer Protection Programme (CPP) for 2024-2029**

Power NI notes the continuation of this programme, has engaged with the UR throughout and is committed to continuing to proactively work in this area. Power NI were generally supportive of the themes identified for 2024-2029 CPP, particularly the proposed areas of work around energy literacy and feel strongly that improving energy literacy and helping a customer understand the

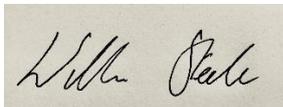
full impact of energy usage in their home is key to success in moving forward with work under Just Transition.

Since the publication of the Best Practice Framework Code of Practice for Customers in Vulnerable Circumstances, Power NI have had several cross functional teams across the business mobilised to deliver and enhance the customer offering to ensure compliance. Power NI has provided feedback to the UR previously regarding the requirement to establish and maintain a Customer Care Register (CCR) and was disappointed to learn that the UR have taken the decision to revert back to the original proposal of moving to one CCR at industry level before moving to one single cross utility level CCR. This will involve significant effort in resources and cost to fully implement, costs which will ultimately be passed to consumers. Power NI do believe that there does need to be a more holistic singular approach in order to ensure consistency across all suppliers and industries as part of the implementation process and to expedite delivery. It is important that before any incremental improvements are made, that the UR provide strategic regulatory clarity and leadership in order to progress this work.

Power NI commends the UR's determination to improve support for customers and is committed to working constructively with the UR across the range of projects referenced in the FWP.

Should you wish to discuss the content of this response please do not hesitate to contact me.

Yours sincerely,

A rectangular box containing a handwritten signature in black ink. The signature appears to read 'William Steele'.

William Steele  
Director  
Power NI Customer Solutions