



6 Merrion Square North,

Dublin,

DO2 FF95

**19/02/2025**

Utility Regulator,

Millennium House,

16-22 Great Victoria Street,

Belfast

BT27AQ

**RE: EAI Response to UR Draft Forward Work Programme 26/27**

Dear UR Team,

EAI welcomes the opportunity to respond to the Utility Regulator's consultation on the Draft Forward Work Programme 26/27. We commend the UR's commitment to advancing key areas in the energy sector. EAI reiterates our support for several aspects of the programme, particularly those that aim to enhance engagement with suppliers on critical issues such as the development and deployment of smart services, as well as improving customer protection. We would like to make the following points in response to this consultation:

**DfE's Smart Meter Design Plan**

We welcome the inclusion of the implementation of the Department for the Economy's Smart Meter Design Plan decision within the draft Forward Work Programme. EAI emphasises the value and importance of including suppliers within the expert groups, and within the oversight groups for communication purposes, to support effective coordination and delivery. In this context, we reference the Smart Senior Stakeholder Group (SSG) structure in the Republic of Ireland, which is widely recognised as an effective and efficient platform for stakeholder engagement.

We hope to see the Smart Metering High-Level Design, to be published by the Department for the Economy, issued at the earliest opportunity, and confirm that EAI and suppliers stand ready

to engage with both the Utility Regulator and the Department for the Economy throughout the implementation process.

A key enabler of the Smart Metering programme will be the resolution of the ongoing issue of meter responsibility which EAI members are actively working with the UR to have resolved. EAI responded to the GSS consultation response and proposed minimally disruptive solution which facilitates the common services model for existing and future metering infrastructure, without the absorbing further market resource. We urge the UR to fully consider this proposal, allowing UR and industry to focus on delivery of Smart Metering for NI customers.

### **ToU and Dynamic Pricing**

We particularly welcome the inclusion of structured and ongoing engagement with electricity suppliers as part of this work programme, recognising their valuable role in the practical design, implementation and customer communication of new tariff structures. We note that early and meaningful supplier involvement will help ensure that Time of Use and dynamic pricing models are deliverable and capable of supporting consumer understanding, participation and protection throughout the transition.

### **Consumer Protection Programme 20242029**

We welcome the work being undertaken on improving energy literacy and within the private rental sector, including the Utility Regulator's proposed research to explore whether further action is required to promote switching in this sector. EAI stands ready to engage with the Utility Regulator on these workstreams.

### **Customer Care Register Project**

We highlight that this project will require careful and proportionate scoping, given its scale and the potential impact on electricity suppliers. Early clarity on scope, governance, delivery timelines and supplier obligations will be essential to support effective implementation and minimise operational burden.

Finally, we highlight the importance of allowing sufficient time for all stakeholders to undertake any reactive work that may arise. We also request that any updated timeframes associated with the draft Forward Work Programme, including areas that may be deferred from the previous year, are published in order to support effective planning for all stakeholders. We close by welcoming the opportunity to engage with this consultation and confirm that industry is ready to provide further input as required.



Should you have any questions or require any further information, please do not hesitate to contact this office.

Yours sincerely,

*Emma O'Leary*

**Emma O'Leary**

Policy Analyst

Electricity Association of Ireland