

ENERGY SAVING TRUST

Response to:

[Utility Regulator - Draft Fwd Work Programme 2026/2027](#)

February 2025

1. About Energy Saving Trust

Energy Saving Trust is an independent organisation dedicated to promoting energy efficiency, low carbon transport and sustainable energy use to address the climate emergency and to help achieve carbon reduction targets, warmer homes, cleaner air, healthier populations, a resilient economy and a stable climate.

A trusted, impartial voice, we have over 30 years' experience of working closely with both UK and devolved governments. We provide leadership and expertise to support people, communities and businesses to save energy, travel more sustainably and accelerate their just transition to net zero. We empower householders to make better choices, deliver transformative programmes for governments and support businesses and community groups with strategy, research and assurance, enabling everyone to play their part in building a sustainable future.

2. Have we prioritised the right projects? Y/N

Please comment on your response

YES

Households in Northern Ireland have endured an acute cost of energy crisis in recent years, largely as a consequence of over-reliance on volatile international fossil fuel markets. This dependency not only drives high energy prices but also contributes significantly to the escalating climate emergency.

Given the pace and scale of change necessary to meet decarbonisation targets¹, delivering on Northern Ireland's ambitious net zero targets will require significant shifts in behaviour at the individual, community and societal level, including greater engagement with smart meters and tariffs.

Smart Meters

We welcome the Utility Regulator's prioritisation of:

- establishing regulatory frameworks to support implementation of the Department for Economy's Smart Meter Design Plan by Q1 2026/27, and
- developing tariff structures that encourage efficient energy use and incentivise demand-side flexibility.

As we move towards a future where most of our electricity comes from low carbon sources and the electrification of transport and heating increases the demand for electricity, our energy system must become smarter and more flexible.

A key part of this will be households engaging with demand-side flexibility, which smart meters are a key enabler of, and we are therefore pleased that the Utility Regulator will support implementation of the Smart Meter Design Plan.

Smart meters allow households to become more aware of their energy consumption patterns and, where suppliers offer appropriate tariffs and flexibility services, benefit from lower prices at times of excess renewable generation. Smart meters will also enable households to participate in demand-side flexibility to support balancing out peaks in demand as we increase the amount of renewable generation on the grid.

Increased uptake of smart meters will also support consumers to feel the benefits of low carbon technologies installed in their homes, such as [solar panels and heat pumps](#), by enabling them to take advantage of smart tariffs which can provide lower electricity costs at certain times.

We also welcome the Department of Economy's commitment to work with the Utility Regulator and the NI Cyber Security Centre to ensure the cybersecurity of smart EV chargers and other smart appliances and to establish a Cybersecurity Working Group.²

¹ [Climate Change Act \(Northern Ireland\) 2022](#)

² [Transitioning to a net zero energy system - Consultation on design considerations for a Northern Ireland Smart Systems and Flexibility Plan](#)

Demand-side flexibility

We support the Utility Regulator's prioritisation of demand-side flexibility, which, as explained above, will be key in Northern Ireland's transition to a smarter, decarbonised system and allowing households to benefit from using energy flexibly.

Demand-side flexibility will also help to reduce the need for expensive electricity infrastructure upgrades and can help limit rising system costs associated with network reinforcements and curtailment payments.

In 2024, almost 915 GWh of renewable generation in Northern Ireland in 2024 was curtailed - enough to heat 300 million tanks of hot water – highlighting the potential to make even better use of renewable electricity as flexibility services develop.³ During 2025, 24% of all available wind energy in Northern Ireland was curtailed⁴. Although this represented a reduction from 30% in 2024, the decrease was largely driven by the Greenlink interconnector commencing commercial operation in early 2025 and exports being limited by capacity constraints within the transmission network. This resulted in a reduced local requirement for energy consumption and generation in Northern Ireland.

However, curtailed volumes of electricity are rising on average and can be expected to continue to do so, as renewable capacity comes online with the easing of regional strategic planning policy for renewables,⁵ the 'Offshore Renewable Energy Action Plan'⁶ introduction of the 'Renewable Electricity Price Guarantee',⁷ schemes supporting the electrification of heat (such as 'Warm Healthy Homes Scheme' and 'Low Carbon Heat Support Programme') and the anticipated rise in utility scale solar generation,⁸ as has been experienced in the Republic of Ireland (Grid-scale solar energy produced throughout 2024 was surpassed in 2025 by July 2025).

As has been demonstrated by the Greenlink Interconnector, further investment in transmission networks must be urgently prioritised (including in the North-South Interconnector) to support increased renewable generation, reduce downward dispatch and improve energy affordability. The Utility Regulator can play a vital role in ensuring future systems and infrastructure policy considers increased renewable generation and supports demand side flexibility.

Learnings from Great Britain and Republic of Ireland

Uptake of smart meters and tariffs will allow consumers to benefit from low-carbon technologies, such as electric vehicles and heat pumps, by enabling them to use electricity when it is cheapest.

Dynamic Electricity Tariffs

Although dynamic electricity tariffs in GB⁹ remain a niche product, they have demonstrated how consumers with flexible demand can reduce bills by shifting usage to cheaper periods. Northern Ireland can draw lessons from this experience as well as from the introduction of dynamic tariffs in the Republic of Ireland from June 2026.¹⁰ Observing how these tariffs perform in neighbouring markets could help inform the design roll-out of smart tariffs in Northern Ireland.

³ [Housing Executive: Free hot water project to help fuel poverty - BBC News](#)

⁴ [Montel | Curtailed renewables in GB and Ireland 2025](#)

⁵ <https://www.infrastructure-ni.gov.uk/publications/strategic-planning-policy-statement>

⁶ [Offshore Renewable Energy Action Plan for Northern Ireland](#)

⁷ [Renewable Electricity Price Guarantee | Department for the Economy](#)

⁸ [Solar-Potential-economic-benefits-for-NI.pdf](#)

⁹ [For example, Octopus offers the Intelligent Octopus Go tariff that allows households to charge their EVs at very low rates overnight: Intelligent Octopus Go | Octopus Energy](#)

¹⁰ [Don't look back in anger: Making dynamic electricity pricing work for Ireland - Public Policy](#)

Smart Local Energy Systems

Additionally, as part of the design of regulatory frameworks for Smart Meters in Northern Ireland, 'Smart Local Energy Systems' (SLES) should be considered. Unlike traditional centralised energy systems, SLES' leverage local renewable energy sources, storage and digital technologies to optimise decarbonised energy use, reduce reliance on the national grid and place local community needs at the centre of investment decisions.

Great British Energy (GBE) is exploring SLES through pilots and targeting rollout between 2027 and 2030. They intend to collaborate with local authorities and communities to create "place-based" energy solutions, with the Local Power Plan committing £1bn annually to support these initiatives, including £600m for local authorities and £400m for community energy organisations.¹¹.

It is therefore our view that the Utility Regulator should consider supporting the accelerated design and delivery of regulatory frameworks to support the successful implementation of the Smart Meter Design Plan and develop tariff structures that encourage efficient energy use and incentivises demand-side flexibility.

3. Do you have any objections to our proposed projects? Y/N

Please comment on your response?

N/A

4. Do you have any other comments about our proposed projects?

Please provide any comments you have?

Our response to the 'consultation on the design plan for the roll-out of smart electricity meters in Northern Ireland'¹² provides a series of additional recommendations, including lessons that can be learned from the rollout of 'Smarter Pay As You Go' meters in the Republic of Ireland.

We wish to highlight some areas below to consider and progress as part of a successful just energy transition for Northern Ireland consumers in their journey to net zero.

Support departments to meet statutory targets within the Climate Change Act 2022 - Continued Focus on Delivery of CCC Recommendations

While the 'Draft Climate Action Plan'¹³ indicates that we are on target to reach our 2027 emissions reduction targets, progress has been limited on many measures initially recommended by the Climate Change Committee¹⁴ ('CCC'). According to the Department for Energy Security and Net Zero, decreased energy in UK households, since the recommendations in 2023, is likely driven by high energy costs, increased cost of living pressures and notably warmer average temperatures exceeding the 30-year long-term average.

¹¹ [Community energy investment to build community wealth and power - GOV.UK](#)

¹² [Smart electricity meter roll-out in Northern Ireland - Energy Saving Trust](#)

¹³ [Northern Ireland's draft Climate Action Plan 2023-2027 | Department of Agriculture, Environment and Rural Affairs](#)

¹⁴ [March 2023 Advice report: The path to a Net Zero Northern Ireland](#)

As part of the Utility Regulator's objective to support the just transition to net zero and to support Northern Ireland departments to meet their statutory targets, we would ask that measures concerning energy consumers that were recommended by the CCC in their advice on the first three carbon budgets, continue to be assessed and progressed in instances where we are on target to meet emission reduction obligations without implementation of certain recommendations.

Develop new regulatory frameworks to protect consumers in the adoption and use of new technologies'- Incentivising Small-Scale Generation

Incentivising small and medium-scale generation can help drive consumer participation in the energy transition and provide long-term benefits for consumers.

The recently published 'Final Scheme Design for a Renewable Electricity Support Scheme for Northern Ireland'¹⁵, introduces support for 5MW+ generation, which is unsuitable for local generation. Comparatively, the successful Small Scale Renewable Electricity Generation Scheme (SRESS)¹⁶ in the Republic of Ireland offers enhanced support for generators between 50KW – 1MW, making it more accessible to local communities.

The just transition principle in the Climate Change Act (Northern Ireland) 2022, obligates that actions related to emissions reductions take account of the future generations principle, contribute to a resource-efficient and sustainable economy and support the social and economic needs of people in rural areas. The Programme for Government 2024-2027 states that a long-term strategy for 2024-2035 must maximise long-term opportunities for our green economy, to change the lives of our people and communities for the better.

We welcome people being supported to participate in the energy transition wherever feasible to do so, including through local ownership of renewable generation. We would recommend that policy development in this area is accelerated if people living in Northern Ireland are to realise the benefits of the accepted long-term socio-economic benefits associated with local generation and to deliver upon the Utility Regulator's desired outcome to 'develop new regulatory frameworks to protect consumers in the adoption and use of new technologies'¹⁷.

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¹⁵ [Final Scheme Design for a Renewable Electricity Support Scheme for Northern Ireland - Renewable Electricity Price Guarantee | Department for the Economy](#)

¹⁶ [Small-Scale Renewable Electricity Generation \(SRESS\)](#)

¹⁷ [Protecting Consumers on the way to Net Zero Corporate Strategy](#)