

Response ID ANON-XK4Z-G2KM-2

Submitted to Draft Forward Work Programme 2026/2027 consultation
Submitted on 2026-02-19 12:56:23

Introduction

1 What is your organisation?

Organisation:
firmus energy Supply Ltd

2 Have we prioritised the right projects?

Yes

Please comment on your response:

We recognise the breadth and significance of the activities proposed, particularly those aimed at strengthening consumer protection, advancing decarbonisation, and maintaining robust future ready regulatory frameworks across Northern Ireland's energy sector.

We also value the UR's continued commitment to transparency and meaningful stakeholder engagement throughout the consultation process.

Under the Consumer Protection Programme, we acknowledge and support any developments intended to enhance outcomes for all consumers in Northern Ireland.

As a licensed gas supplier committed to delivering high standards of service, we would also welcome further clarity on the UR's proposed approach to measuring and benchmarking customer experience across regulated sectors.

We note the New Meter Solution for the gas market in Northern Ireland (NI) is not included in the project plan for 2026/2027. During this time period there will be significant input from all stakeholders to ensure successful roll out in a timely, cost-effective manner that brings the benefits of the new meter to prepayment gas customers within NI.

We believe this project should be referenced in the plan alongside the Smart Meter rollout for electricity customers.

3 Do you have any objections to our proposed projects?

No

Please comment on any objections:

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

Please provide any comments you have:

firmus energy welcomes the opportunity to comment on the Utility Regulator's Draft Forward Work Programme (FWP) for 2026/27.

We acknowledge and support the UR's focus on gas decarbonisation and firmus energy are committed to supporting the Northern Ireland Energy strategy by ensuring customers receive clear, accurate and trusted information during the energy transition. firmus energy would welcome guidance on expected policy timelines, particularly in conjunction with the Department for the Economy.

As the economic regulator for Gas in Northern Ireland we note the importance of the SPC, included as a project on the plan. Price Controls offer an opportunity to support suppliers in their endeavours for innovations in the gas market, to be adequately resourced to meet and exceed in the delivery of the strategic objectives and the drive to help deliver a Just Transition.

We have outlined in our response to question 2 that we believe the New Meter Solution for the gas market should be a project within this plan. This solution should see a significant improvement in metering technology for pay as you go customers and stakeholders through both the new meter and the meter management system. However, there will be significant costs and it is imperative that adequate allowances and support are provided as part of the SPC to deliver the best results.

More generally, it is our experience that changing industry and regulatory requirements (for example Codes of Practice and the FWP's commitment to additional "consumer service and protection" measures) are not always considered or catered for when setting forward looking price controls. As a price-regulated gas supplier committed to high levels of compliance, it is highly important to firmus energy that the UR creates a price control structure that allows for the recovery of future incremental cost associated with the FWP or other measures. Noting that such costs may not be known to suppliers at the time of SPC final determination.

At firmus energy we are committed to providing outstanding customer service in each and every interaction with our customers. We therefore welcome both the ongoing and new engagement with the UR and other stakeholders to deliver the proposed enhancements. We believe that the levels of customer service and protection within NI are already of a high standard, strengthened with the introduction of the Code of Practice for Consumers in

Vulnerable Circumstances and Customer Service.

firmus energy has been an active participant in the review and implementation of the Consumer Energy Charters. We remain fully engaged in this process and will continue to work alongside the UR and other stakeholders to provide support and enhanced protection to domestic and small business customers during the winter period.

We remain committed to working collaboratively with the UR to support safe, reliable, and increasingly sustainable energy services for consumers across Northern Ireland.