

christians  
against  
poverty

**CAP**

# **Utility Regulator Consultation: Forward Work Programme 2026/27**

CAP's official submission to  
Utility Regulator's Consultation

December 2025

## Summary

Christians Against Poverty (CAP) has almost 30 years of experience in delivering debt help. CAP supports over 8,000 people on their journey out of debt each year and has specialist in-house teams to support vulnerable individuals. Through this experience, CAP has developed insight into the varied and complex needs of vulnerable consumers and their relationships with creditors.

- CAP welcomes the Utility Regulator's continued focus on consumer protection, especially for vulnerable consumers and the commitment to the transition to net-zero.
- CAP supports the Utility Regulator's commitment to a just transition to net-zero but emphasises the importance of making this transition fair and affordable, particularly for those in fuel poverty. It is vital that social tariffs and financial support mechanisms are in place to help low-income households adjust to renewable energy solutions.
- CAP recognises the development of dynamic pricing models and smart metering. CAP urge the Regulator to carefully assess their impact on low-income households. These initiatives must include safeguards to avoid disproportionately affecting vulnerable consumers who cannot adjust their energy usage to off-peak periods.
- CAP encourages prioritising the provision of tailored support for consumers facing multiple, intersecting vulnerabilities, including those with mental health challenges, housing instability, financial hardship and poverty.
- The success of these long-term projects relies on maintaining alignment between multiyear budgets and project timelines. CAP stresses the need for these initiatives to be closely aligned with government priorities, ensuring they are delivered with minimal disruption to consumers, particularly those affected by poverty, even amidst potential political or budgetary uncertainties.



## Questions

### Q1: Prioritisation of Projects

CAP welcomes the continued emphasis on consumer protection, particularly for vulnerable groups. However, CAP recommends that greater priority be given to the provision of tailored support for consumers facing complex and intersecting vulnerabilities, such as those experiencing mental health challenges, housing instability, or financial hardship. This should be more explicitly integrated into the UR broader approach to consumer protection and regulatory strategies.

### Q2: Objections to Proposed Projects

CAP recognises the continued development of dynamic pricing models and Time of Use (ToU) tariffs as part of the broader strategy for a modernised energy system. The UR's work to implement cost-reflective tariffs and smart meter-based pricing builds on the foundation laid in the previous year.

While CAP acknowledges and supports the principles behind the smart metering and dynamic pricing initiatives, CAP strongly encourages the UR to carefully assess their potential impact on low-income households. It is essential that these initiatives are introduced in a manner that does not inadvertently disadvantage vulnerable consumers, particularly those who may lack the flexibility to adjust their energy usage to off-peak periods. To ensure the successful implementation of these projects, CAP recommends that they be accompanied by clear communication and targeted financial literacy campaigns. These efforts will help consumers fully understand and engage with the changes, while mitigating the risk of exacerbating financial pressures.

Specifically, CAP has concerns regarding the introduction of dynamic pricing without the necessary safeguards or support structures. In this context, CAP emphasises the importance of introducing a single, clearly defined and automatically applied social tariff to provide consistent, transparent and targeted protection for households experiencing financial vulnerability. A unified social tariff would reduce complexity, improve accessibility and ensure that eligible consumers are not required to navigate multiple schemes or application processes to receive support. Moreover, the application of appropriate energy cost caps such as a single social tariff or similar tailored adjustments should be in place for vulnerable consumers who may be unable to shift their energy usage effectively, ensuring that the transition to more flexible pricing does not deepen existing inequalities.

### **Q3: Timing of Projects**

CAP recognises that many of the proposed projects are ambitious and will span multiple years, requiring a stable and consistent funding framework, typically provided through multiyear budgets. While Northern Ireland currently has a functioning government, potential delays in budget approval or changes in political priorities may introduce uncertainties.

To ensure the successful delivery of these projects, it is essential that there is continued alignment between multiyear budgets and the long-term nature of these initiatives. Given this, it is equally important that these projects proceed with minimal disruption to consumers, particularly vulnerable groups such as those experiencing the impacts of poverty, even in the face of potential political or budgetary delays. To achieve this, the UR work closely with the government to minimise any potential impact on consumers.

### **Q4: Any other comments**

CAP recognises the UR's commitment to a just transition to net-zero, including the development of frameworks for offshore wind and renewable energy that are critical to achieving Northern Ireland's climate goals. However, CAP emphasises that it is imperative this transition remains fair and affordable for all households, particularly those in fuel poverty. The shift to a low-carbon economy should not place undue financial burdens on households, especially those already struggling with the compounded effects of poverty. CAP encourages the UR to continue its focus on improving energy efficiency for low-income households, which should include targeted financial support to assist these households in implementing necessary upgrades to improve energy efficiency. Additionally, it is essential that social tariffs are maintained to help offset the costs associated with the transition to renewable energy.

CAP also notes that Ofgem is due to introduce a new initiative aimed at reducing levels of household energy debt, where consumers engage with support mechanisms. Whilst CAP acknowledges Ofgem as the GB regulator, considerations should be given to whether a similar approach may be appropriate and replicable in Northern Ireland, particularly in supporting low-income households who are disproportionately affected by energy debt. Exploring measures that proactively reduce debt while encouraging engagement may further support a fair and inclusive transition.

CAP also welcomes the ongoing extension of the vulnerability strategies introduced in the previous business plan, particularly in terms of strengthening protections for bereaved

families, households in debt, and consumers with disabilities. CAP fully supports these initiatives and urges the UR to further enhance its efforts in addressing the needs of consumers who face multiple and complex vulnerabilities, such as those managing both debt and mental health issues, housing instability, and other intersecting challenges. It is critical that tailored, comprehensive support remains available to these groups. CAP recommends that the UR continue its work with charities and advocacy organisations to ensure that these needs are effectively met.

Lastly, CAP appreciates the UR's continued commitment to consultation and stakeholder engagement, particularly in areas such as firm access arrangements and interconnector development. These efforts are vital in ensuring that the voices of vulnerable consumers are effectively represented in the regulatory process. CAP strongly encourages the UR to ensure that consumer groups remain actively involved in the development of new regulations, particularly those that affect vulnerable consumers, including those living in poverty. This will help ensure that regulatory changes are fully informed by the lived experiences of these groups and are designed to minimise subsequent negative impact.

### **About Christians Against Poverty (CAP)**

Christians Against Poverty (CAP) equips local churches across the four UK nations to provide holistic support for families and individuals facing problem debt through a free face-to-face service, as well as community groups designed to tackle the causes and consequences of poverty. Together these services seek to address both financial difficulty and the wider emotional impact. All CAP's services are free of charge and available to everyone, regardless of age, gender, faith and background. To find out more, visit [capuk.org](http://capuk.org).

### **Requests for further information**

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