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Submitted to Draft Forward Work Programme 2026/2027 consultation
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Introduction

1 What is your organisation?

Organisation:
Fermanagh Omagh District Council

2 Have we prioritised the right projects?

Yes

Please comment on your response:

Fermanagh Omagh District Council welcomes the opportunity to respond to UREGNI's Draft Forward Work Programme 2026/27 and acknowledges the important role the Utility Regulator plays in protecting consumer interests and supporting sustainable service delivery.

Whilst Council agrees with the type of projects detailed within the Forward Working Programme, we are concerned that there is relatively limited reference to works specifically aimed at improving water and wastewater infrastructure, particularly in the context of increasing environmental pressures (besides a brief reference to NI Water PC28). This lack of detail is notable given the growing and well-documented challenges facing Northern Ireland's water environment.

Of particular concern is the worsening prevalence of blue-green algae in rivers and loughs which has significant implications for public health, environmental quality, tourism and local economic development. Local authorities are increasingly required to respond to the consequences of these events, yet the Draft Work Programme provides little clarity on how regulatory activity during 2026/27 will drive the necessary infrastructure investment and system performance improvements required to address the underlying causes.

While we recognise that funding decisions ultimately sit with the Northern Ireland Executive, UREGNI's forward work programme is a critical mechanism for signalling priorities and ensuring that regulatory processes actively support long-term resilience and environmental compliance. In this regard, the absence of clear actions or outputs relating to wastewater capacity, nutrient reduction, and network performance creates uncertainty as to how the escalating risks associated with algal blooms will be mitigated.

We would therefore urge UREGNI to strengthen the Draft Work Programme by:

Providing clearer detail on how regulatory activity will support accelerated investment in water and wastewater infrastructure;

Explicitly recognising the link between infrastructure constraints and environmental outcomes, including blue-green algae;

Setting out how engagement with NI Water, government departments and local authorities will contribute to addressing these challenges in a coordinated and outcomes-focused manner.

Greater clarity in these areas would provide reassurance to local authorities and communities that the regulatory framework is aligned with the scale and urgency of the environmental issues now being experienced across Northern Ireland.

We would also offer the following additional comments:

Rural and Regional Impacts:

The Council encourages the Utility Regulator to explicitly consider rural proofing across relevant projects, particularly those related to infrastructure investment, affordability, and the transition to low-carbon energy systems.

Stakeholder Engagement:

While the consultation itself is welcomed, the Council would support enhanced ongoing engagement with local authorities, including opportunities for regional engagement events outside the Belfast metropolitan area.

Clarity and Transparency:

Additional detail on project scope, expected outputs, and indicative timelines, particularly for multi-year or cross-cutting projects, would assist councils and other stakeholders in understanding how the programme will deliver practical benefits on the ground.

Just Transition:

The Council supports the objective of a just transition to net zero and encourages continued focus on protecting vulnerable consumers and ensuring that regulatory changes do not disproportionately impact rural households or small businesses.

The Council looks forward to continued engagement with the Utility Regulator as the Forward Work Programme 2026/27 is finalised and implemented.

3 Do you have any objections to our proposed projects?

No

Please comment on any objections:

The Council notes that the overall programme, as set out in the Draft Forward Work Programme, reflects a balanced and proportionate approach.

However, the Council would encourage the Utility Regulator to ensure that the design and delivery of projects adequately reflect the needs of rural communities. In particular, consideration should be given to how regulatory decisions and investment frameworks impact areas that are geographically remote, less densely populated, or more reliant on specific energy and water infrastructure.

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

Please provide any comments you have:

Fermanagh Omagh District Council welcomes the Utility Regulator's plan to "undertake a public consultation on firm access arrangements in Northern Ireland, building on the findings of the scoping exercise completed in 2025/2026."

The impacts of 'firm access arrangements' require careful consideration to ensure regional equality. The Fermanagh and Omagh district sits at the "end" of the transmission network, geographically distant from large-scale centralised generators, which in turn presents specific challenges.

Network capacity across the district is limited, making it more difficult for new and existing renewable generators to secure 'firm access' without substantial network reinforcement. If firm access is preferentially allocated to generators located closer to the centre of the network, this could further disadvantage peripheral areas such as Fermanagh and Omagh, thereby exacerbating existing regional inequalities.

In addition, the costs associated with network upgrades required to facilitate firm access in constrained locations may be passed on to consumers if not managed appropriately, potentially leading to higher electricity bills. There is also a risk that overly restrictive or costly firm access criteria could slow the development of renewable energy projects within the district, limiting opportunities for local communities to benefit from renewable generation. In order to ensure positive outcomes for residents across Northern Ireland, the Council would like to reiterate the importance of ensuring firm access arrangements should:

Take account of regional and rural impacts, recognising the challenges faced by end-of-network locations.

Avoid creating a two-tier system where some areas consistently benefit from firm access while others face ongoing constraints.

Be aligned with wider policy objectives, including regional balance, decarbonisation, and affordability.

Include strong stakeholder engagement, ensuring that residents and local authorities in affected areas have a meaningful voice in the consultation process.

The Council also welcomes the actions to “Establish the regulatory frameworks required to support the implementation of the DfE’s Smart Meter Design Plan decision” and “Develop tariff structures that are cost reflective, encourage efficient energy use, and support the transition to net zero through the introduction of Time of Use (ToU) and dynamic pricing models” and considers them to be inherently interdependent. The Council strongly supports their development and implementation in a coordinated manner, as the full benefits of smart metering can only be realised where appropriate tariff structures such as Time of Use (ToU) and dynamic pricing, are available to consumers.

From the perspective of the Fermanagh and Omagh district, these actions present a significant opportunity to maximise the benefits of the area’s high levels of wind energy generation and to support a more flexible, efficient local and regional energy system.

Smart meters provide the essential data and system capability required to enable Time of Use (ToU) and dynamic tariffs, while those tariffs, in turn, create the price signals needed to encourage consumers to adapt their energy usage in line with renewable generation activity.

Pricing signals can be used to encourage residents to consume electricity during periods of high wind output, helping to reduce renewable curtailment and improve overall system efficiency, support greater integration of local and regional renewable energy into the electricity system, contributing to Northern Ireland’s net zero ambitions and provide opportunities for households and businesses to reduce energy costs by shifting demand to lower-priced periods, particularly where smart technologies such as electric heating, hot water systems, and electric vehicles are in use.

The Council would also take this opportunity to restate its view that the regulatory framework underpinning smart metering and tariff reform must be fair, transparent, and inclusive, particularly for rural communities. Many households in Fermanagh and Omagh face challenges including limited alternative heating options, lower grid resilience, and a higher risk of fuel poverty. As such, careful consideration must be given to:

Protecting vulnerable consumers who may have less flexibility to shift demand;

Ensuring that ToU and dynamic tariffs are optional, clearly explained, and supported by effective consumer engagement and education; and

Designing tariff structures that reflect rural network characteristics and avoid unintended cost impacts on remote or low-income households.

The Council therefore urges the Utility Regulator to continue refining these actions, with smart meter regulatory frameworks structured from the outset to enable flexible tariff arrangements to improve overall system efficiency and reflect system conditions, alongside clear and robust safeguards for consumers.

Implemented effectively, Council believe these co-dependent actions can deliver tangible benefits for consumers, support the efficient use of wind energy resources, and help ensure a just, fair and balanced transition to a low-carbon energy system across Northern Ireland.