

CONSULTATION RESPONSE

Submitted: January 2026 | Contact: shannon.barber@nea.org.uk

Utility Regulator: Consultation on draft Forward Work Programme 2026/2027

About National Energy Action

National Energy Action (NEA) is the national fuel poverty charity. We've worked across England, Wales, and Northern Ireland for over 40 years, to ensure that everyone can afford to live in a warm, healthy home.

Together with frontline practitioners, companies, regulators and governments, National Energy Action works to support vulnerable clients, raise awareness and achieve enduring change.

In Northern Ireland, we chair the [Fuel Poverty Coalition NI](#) and act as the secretariat to the [All-Party Group on Fuel Poverty](#). We advocate for policy and regulatory reforms to protect the most vulnerable, and we deliver accredited training to improve standards in energy advice.

Through the [Belfast Warm and Well Project](#), we provide advice and practical support to local people struggling to keep their homes warm.



Consultation Response

Question 1: What is your organisation?

National Energy Action Northern Ireland (NEA NI)

Question 2: Have we prioritised the right projects? Please comment on your response.

Yes.

We can see clear alignment between the list of projects and delivery of the Utility Regulator's (UR) statutory functions and strategic objectives, including protecting the short- and long-term interests of energy consumers. There appears to be a good balance of projects focused on addressing immediate customer service and consumer protection concerns, alongside projects preparing for longer-term sustainability and energy security.

Additionally, the programme appears to support the development of government policy such as the development of regulatory frameworks for DfE's Smart Meter Design Plan decision and DfE's Offshore Renewable Energy Action Plan. It is vital that the UR's involvement in this effectively protects consumers, including those in or at risk of fuel poverty, with regard to quality of service and minimising any potential energy price increases as a result of such plans.

We are particularly supportive of the aims of the Consumer Protection Programme (CPP24) for 2024-2029 and are pleased to see this work continuing into its third year. We take a great deal of interest in seeing that this programme results in better protection and supports low-income and vulnerable households and we continue to value our collaboration with the UR on this, including through the Consumer Protection Advisory Group.



Question 3: Do you have any objections to our proposed projects? Please comment on any objections.

Yes.

In the list of projects for delivery under CPP24 Year 3, building the evidence base for an energy social tariff is not included, despite the UR's CPP24 Delivery Plan listing this as a Year 2 and Year 3 project. We raised this same point in our consultation response to the UR's draft FWP 2025-26 and the UR responded to confirm that the project had commenced. We welcome this, but query why again, the 'Social Tariff (Evidence Base)' project is not explicitly listed in the draft FWP.

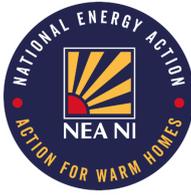
The reason we are concerned about this is because NEA NI strongly supports the introduction of an energy social tariff to support low-income and vulnerable households with unaffordable energy bills. In the draft Fuel Poverty Strategy for NI, DfC proposed investigating targeted affordability support further. An evidence base and exploration of operational models for NI is needed from the UR to inform and advise policy development in this area. Therefore, we believe that the project 'Social Tariff (Evidence Base)' ought to be included explicitly in the UR's FWP 2026/2027.

Question 4: Do you have any other comments about our proposed projects? Please provide any comments you have.

Yes. Please note that some of these comments are a repeat of comments made in our response to the UR's previous FWP consultation, as we believe they remain valid.

Further comments:

- **'Supporting the Just Transition to Net Zero: Understanding consumer expectations around Just Transition'** – We recommend the UR engages with the Consumer Council for Northern Ireland and its existing research on consumer attitudes towards the



energy transition¹. This collaboration will help to ensure research efforts are complementary and avoid unnecessary duplication.

- **‘Consumer Energy Charters’** – NEA NI strongly supports this initiative to develop domestic and non-domestic Consumer Energy Charters, providing enhanced protections for small businesses and households, particularly during winter. Given the importance of these charters, we recommend that their launch and implementation become a **routine** part of the UR’s annual work, rather than being treated as a non-routine project.
- **‘Establish the regulatory frameworks required to support the implementation of the DfE’s Smart Meter Design Plan decision’** – We note that the UR says it will commence implementation in collaboration with Expert Groups during Quarter 1 2026/2027. We are interested in the membership and make-up of these Expert Groups, as we are keen to be involved, utilising our extensive experience of supporting fuel poor and vulnerable households and our involvement in the roll-out of smart meters in GB.

Additional recommendations:

- **Engage with DfC and the wider Executive on implementation of the new Fuel Poverty Strategy for NI** – We recommend this is included in the FWP, in anticipation of the forthcoming publication of the new Fuel Poverty Strategy for NI. There is a need for the UR to work closely with DfC, DfE, and the wider Executive, particularly on the following aspects as noted in the draft strategy:
 - Developing and expanding referral pathways to create a more coordinated and holistic support system for people struggling with fuel poverty.²

¹ Consumer Council for Northern Ireland, (2023). [‘Consumer attitudes to the energy transition’](#).

² For further information see: Department for Communities, (2024). [‘Consultation on a draft Fuel Poverty Strategy’](#), pp. 30 – 31.



- Supporting the development of an evidence base for a social tariff to improve affordability for vulnerable consumers.³
- Ensuring robust consumer protection frameworks are in place across all government supported energy efficiency schemes.⁴
- **Enhancing the knowledge base among sector colleagues and frontline organisations** – We would like to see a dedicated project focused on building the capacity of organisations that support low-income and vulnerable households. This could include providing expert guidance on regulatory and operational issues, as well as the broader functioning of the energy system in NI. Strengthening sector-wide understanding would enable frontline organisations to better navigate the complexities and ongoing developments within the energy market, as we support vulnerable consumers. **We raised this in our response to the previous FWP consultation and appreciate that the UR responded to say it had noted our suggestion and would consider how it could contribute to this. We would appreciate an update on this consideration.**

For ease of reference, points we request clarification on:

NEA NI would welcome clarification or confirmation from the UR on the following:

- **Social Tariff (Evidence Base):** Why this project is not explicitly listed in the draft FWP 2026/2027, and whether it will be included in the final programme.
- **Smart Meter Design Plan – Expert Groups:** Details on the membership of the Expert Groups and how NEA NI can be involved.
- **Fuel Poverty Strategy for NI:** Whether and how the UR will engage with DfC, DfE and the wider Executive on implementation, and reflect this in the FWP.
- **Support for frontline organisations:** An update on consideration of a project to build capacity and knowledge among organisations supporting vulnerable consumers.

³ For further information see: Department for Communities, (2024). [‘Consultation on a draft Fuel Poverty Strategy’](#), pp. 41 – 42.

⁴ For further information see: Department for Communities, (2024). [‘Consultation on a draft Fuel Poverty Strategy’](#), pp. 42 – 45.



We appreciate the opportunity to provide feedback and look forward to continued engagement on these issues.