



Regulatory Approach to Future Electricity Network Price Controls

Response by the Consumer Council for Northern Ireland

23 January 2026

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1. Overview of our response

The Consumer Council for Northern Ireland (the Consumer Council) welcomes the opportunity to respond to the Regulatory Approach to Future Electricity Network Price Controls from the Utility Regulator.

The Consumer Council is pleased to respond to the Utility Regulator's (UR) Call for Evidence relating to future electricity network price controls.

As the energy transition gathers pace, the need to ensure a balance between providing certainty for investors in renewable generation on connections and operations becomes increasingly important. This investment is key to enable NIE Networks (NIEN) to upgrade and expand the network, and ensure that consumers have reliable access to electricity, at an affordable price.

The scale of investment allowed across RP7, and the expectation that this level will continue during RP8, means ensuring the costs are justified and consumers are appropriately protected, especially in the absence of competitive market conditions.

As one of the members of the Consumer Engagement Advisory Panel (CEAP), the Consumer Council will continue to advocate strongly on behalf of Northern Ireland consumers ensuring that the panel are integrating the consumer voice into the day-to-day running and decisions of NIEN.

We will also continue to help establish a baseline and benchmark for consumer service quality against other network companies in other jurisdictions. This approach will help integrate a best practice approach into how NIE Networks engages with and serves their customers throughout RP7, and hopefully into RP8.

We recognise the need for the UR to benefit from specialist advisors during price control processes and anticipate that this might expand to include cyber security and AI experts for RP8.

The Consumer Council hopes that the lessons learnt from the RP7 process, and further learning from the setting of new targets, re-openers and performance reporting during RP7, will form key inputs into the RP8 process.

We assume that the UR will take account of other relevant consultations impacting electricity networks and consumers as well as Ofgem's approach to Electricity Distribution Price Control (ED3) in GB. This should include areas such as environmental action plans, flexibility, connections and customer service. The UR should then incorporate those into the RP8 process, after consideration of their relevance to Northern Ireland.

The Consumer Council agrees with the Business Plan Assessment approach but stress the need to ensure that "good" or "exceptional" plans address how best to serve customers and other stakeholders.

Stakeholder input will be critical in shaping improvements to future price control processes and ensuring that regulatory frameworks remain robust, transparent, and responsive to evolving system needs.

The Consumer Council looks forward to working with the UR and NIE Networks (NIEN) to help ensure that the current projects in RP7 and the future projects in RP8 deliver the best possible outcomes for Northern Ireland consumers.

2. About the Consumer Council

The Consumer Council is the statutory consumer representative body for Northern Ireland, responsible for protecting, empowering and representing consumers, and promoting their interests.

We operate under our sponsor department, the Department for the Economy (DfE), on behalf of the Northern Ireland Executive.

We are an insight-led evidence-based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Protecting consumers by investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice, welfare and protection.
- Our statutory powers cover consumer affairs, energy, transport, water and sewerage, postal services and food affordability and accessibility.

These legal responsibilities are drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding. The work we carry out also aligns with a number of the Articles in the Protocol on Ireland and Northern Ireland¹ (NI Protocol).

Our non-statutory functions educate, empower and support consumers against discriminatory practices in any market through advocacy work, as well as education and outreach programmes covering a broad range of topics including promoting consumer rights, financial inclusion and a more sustainable energy future.

We serve Northern Ireland's 1.9 million citizens and champion consumers in everything we do. We prioritise those who are disabled or chronically sick, who are of pensionable age, who are on low incomes and who live in rural areas.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. Our aim is to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories.

¹ [Protocol on Ireland and Northern Ireland](#), House of Commons Library

2.1 Our role in super-complaints

We are also a designated super-complaints body set up under the Enterprise Act 2002² and the Financial Services and Markets Act 2000 Order 2013³.

Under both Acts, if the Consumer Council believes any feature or combination of features of a market in the United Kingdom (UK) is, or appears to be, significantly harming the interests of consumers, we can raise a super-complaint on behalf of consumers to the following regulators:

- Civil Aviation Authority (CAA)
- Competition and Markets Authority (CMA)
- Financial Conduct Authority (FCA)
- Office of Communications (Ofcom)
- Office of Gas and Electricity Markets (Ofgem)
- Office of Rail and Road (ORR)
- Payment Systems Regulator (PSR)
- Northern Ireland Utility Regulator (Utility Regulator)
- Water Services Regulation Authority (Ofwat)

Under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015⁴, we can appeal to the CMA if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.

Our role in consumer affairs

Our principal statutory duty is to safeguard the interests of consumers in Northern Ireland by empowering them and providing a strong representative voice to policy makers, regulators and service providers. We do this by:

- Carrying out, or assisting in carrying out, inquiries.
- Considering and investigating complaints under statutory functions, and where appropriate, any complaint relating to consumer affairs.
- Promoting and disseminating any information related to consumer affairs in order to educate and empower consumers.
- Undertaking independent research and monitoring consumer experiences.
- Reporting to any Northern Ireland Executive Department on any matter relating to consumer affairs.

² [Enterprise Act 2002](#), UK Parliament

³ [Financial Services and Markets Act 2000 Order 2013](#), UK Parliament

⁴ [Gas and Electricity Licence Modification and Appeals Regulations \(Northern Ireland\) 2015](#), Northern Ireland Assembly

Our role in energy

Part IV of the Energy (Northern Ireland) Order 2003⁵ (the 2003 Order) confers certain functions on the Consumer Council regarding “the interests of consumers” (that is the interests of consumers in relation to gas or electricity supplied by authorised suppliers) and “consumer matters” (that is any matter connected with “the interests of consumers”).

In considering “the interests of consumers”, we are required to have particular regard to those detailed earlier in this section, but this does not mean that regard may not be had to the interests of other descriptions of a consumer or consumer groups.

The functions of the Consumer Council under the 2003 Order (Articles 17 to 23) include the following:

- Obtaining and keeping under review information about consumer matters, and information about the views of consumers on such matters. In relation to this, where the Utility Regulator is required by any provision of the Electricity (Northern Ireland) Order 1992⁶ and the Gas (Northern Ireland) Order 1996⁷ to publish a notice or any other document, it shall send a copy to the Consumer Council.
- Making proposals, or providing advice and information about consumer matters and representing the views of consumers on such matters to public authorities, persons authorised by a licence or exemption under the Electricity (Northern Ireland) Order 1992 and the Gas (Northern Ireland) Order 1996, and other persons whose activities may affect the interests of consumers. This includes undertaking independent research and monitoring consumer experiences.
- Providing information about consumer matters to consumers of electricity or gas supplied by authorised suppliers.
- Publishing statistical information about certain complaints about authorised electricity and gas suppliers.
- Publishing advice and information about consumer matters to promote interests of consumers.
- Investigating certain complaints made by any customer, or potential customer of, or user of electricity or gas supplied by an authorised supplier.
- Investigating other matters relating to the interests of consumers in relation to electricity and gas supplied by authorised suppliers.

The Consumer Council also has the following statutory responsibilities in energy:

- Under the Electricity (Northern Ireland) Order 1992 and the Energy (Northern Ireland) Order 2003 regarding the standards of service, we deal with complaints and billing disputes between an electricity supplier and a customer.

⁵ [Energy \(Northern Ireland\) Order 2003](#), UK Parliament

⁶ [Electricity \(Northern Ireland\) Order 1992](#), UK Parliament

⁷ [Gas \(Northern Ireland\) Order 1996](#), UK Parliament

- Under the Gas (Northern Ireland) Order 1996, we deal with billing disputes between a gas supplier and a customer.
- Under the Energy Act (Northern Ireland) 2011⁸, we deal with disputes of standards of performance between gas suppliers and customers in individual cases.

⁸ [Energy Act \(Northern Ireland\) 2011](#), Northern Ireland Assembly

3. Our approach

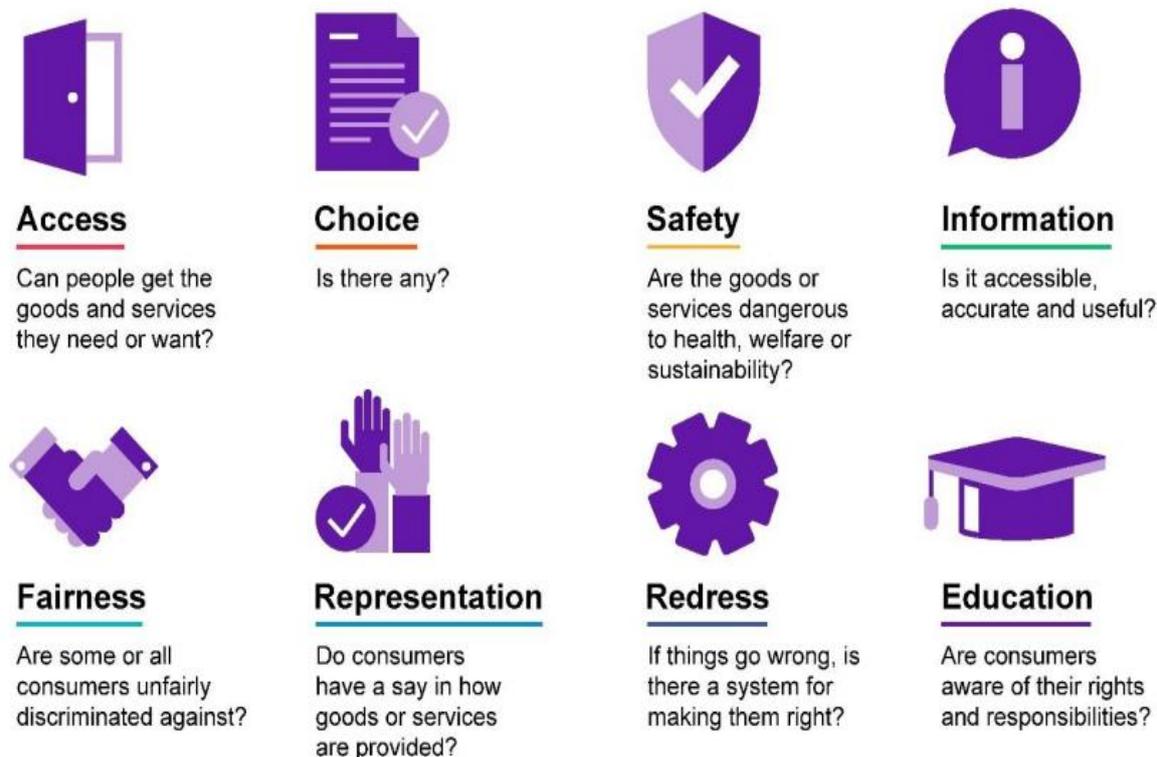
In this section, we have set out our approach to the the Regulatory Approach to Future Electricity Network Price Controls from the Utility Regulator (UR).

3.1 Consumer protection principles

The Consumer Council uses eight guiding principles to assess where the consumer interest lies, and develop and communicate our policies, interventions and support.

They provide an agreed framework through which we approach regulatory and policy work and ensure we apply a consistent approach across statutory and non-statutory functions, and in our engagement with consumers and stakeholders.

Figure 1: Consumer protection principles



They serve to protect consumers, setting out minimum standards expected from markets when delivering products or services in Northern Ireland.

They frame our policy position and approach to addressing emerging detriment and resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable consumer groups.

3.2 Northern Ireland consumer position

Before setting out our response, we feel it is important to highlight some key considerations about the consumer position in Northern Ireland.

Northern Ireland has unique considerations with a more vulnerable population, a regional market, geographical separation from the remainder of the UK market, a land border with the Republic of Ireland (RoI) and European Union (EU), and a legislative environment impacted by regulatory divergence.

Consumer detriment levels in Northern Ireland can be significant but given our relatively small population in comparison to the UK, the detriment our consumers face can sometimes struggle to be prioritised, reported and monitored on, at a national level.

We are more rural

Northern Ireland represents just 3% of the total UK population⁹ but we have more than double the proportion of citizens living in rural areas (36%)¹⁰ compared to England (16.6%)¹¹ and Scotland (17%)¹².

This is particularly relevant as our population growth in rural areas from 2001-2020 has outstripped urban areas by a factor of almost three to one (20% to 7%)¹³. Rurality can heighten vulnerability in some markets and supply chains.

We are more vulnerable

Every day, we support consumers with expert, confidential advice and services.

Between April 2021 and March 2024, we have supported over 70,000 consumers through to our consumer helpline and free and independent complaint investigations, and outreach and education programmes across Northern Ireland. Our casework shows heightened vulnerability with more complex and multi-faceted needs.

This work is underpinned by our extensive portfolio of consumer monitoring and research into their lived experiences, expectations and perspectives. We therefore have unique insights into the socio-economic trends influencing consumers' behaviour and confidence, and the challenges and opportunities they face.

We also take quarterly temperature checks of the cost of living impacts on consumers in Northern Ireland. Our latest Pulse Survey from March 2025¹⁴ found:

- 37% felt that their household was worse off when compared to 12 months ago and only a third (33%) believed their household would be better off in 12 months' time.
- Almost three-quarters (74%) of respondents agreed that their household could keep up with bills and buying essentials, but 16% said they have £50 or less each month, with 36% stating they have £150 or less left over each month, after mortgage/rent and all essential bills had been paid.

⁹ [Estimates for the population for the UK, England, Wales, Scotland, and Northern Ireland: Mid-2024](#), September 2025, Office of National Statistics

¹⁰ [NI: IN PROFILE Key statistics on Northern Ireland](#), November 2022, Northern Ireland Statistics and Research Agency

¹¹ [Statistical Digest of Rural England - GOV.UK, May 2025](#)

¹² [Rural Scotland Data Dashboard: Overview](#), December 2023, Scottish Government

¹³ [Key Rural Issues: Northern Ireland, 2024](#), Department of Agriculture, Environment and Rural Affairs

¹⁴ [Consumer Pulse Survey November 2025](#), November 2025, Consumer Council

- 44% agreed dealing with financial matters was a burden and more than a third (35%) agreed their mental health was negatively affected by their financial situation.
- Almost three in five (58%) stated they have had to cut back on spending on essentials after their mortgage/rent and any loan or overdraft payments have been made.

We are less well off

The Consumer Council has monitored household income and expenditure since 2021. The latest Northern Ireland Household Expenditure Tracker¹⁵ found half of our households had less than £110 per week after paying taxes and essential spending.

Between April and June 2025, our lowest earning households:

- Had a total household income per week before tax of just over £295.94, which is 6% lower than the UK average.
- Had just over £52 per week after paying taxes and paying for essentials, which is 19% lower than the peak of Q1 2021, of just over £64.
- Spent almost half (46%) of their total basic spending on food and non-alcoholic beverages, housing, water, electricity, gas and other fuels, and transport.
- Are more reliant on social securities, with 70% of income coming from benefits compared to 8% for the highest earning households in NI.

We have a unique energy market

Northern Ireland has a unique energy mix to the rest of the UK. Most households here (62.5%)¹⁶ use heating oil as their primary source of energy to heat their homes, rising to 82% in rural areas¹⁷. Alongside this, approximately 51% of gas and electricity customers in Northern Ireland are on prepayment meters¹⁸, compared to approximately 14% overall in the UK¹⁹.

This presents higher risks of self-disconnection, particularly amongst vulnerable consumer groups, against a continuing backdrop of high energy prices, and a unique challenge for Northern Ireland net zero ambitions.

¹⁵ [Household Expenditure Tracker Q2 2025](#), October 2025, Consumer Council

¹⁶ [NISRA Census 2021 health & housing statistics](#), (main statistics tables (phase 2)) December 2022, Northern Ireland Statistics and Research Agency

¹⁷ [The cost of living crisis in Scotland, Wales and Northern Ireland, 19 July 2023](#): Centre for Progressive Policy

¹⁸ [Quarterly Retail Energy Market Monitoring Report for Q2 2025](#), 30 September 2025, Utility Regulator

¹⁹ Calculated based on the estimated number of pre-payment customers ([Ofgem launches national evidence-call on prepayment meters](#), March 2023, Ofgem) as a percentage of the total estimated number of UK households ([Families and households in the UK: 2023](#), July 2025, Office of National Statistics).

4. Our response to individual questions

In this section, we have set out our response to the Regulatory Approach to Future Electricity Network Price Controls from the Utility Regulator (UR).

The Consumer Council have structured our response to those consultation summary questions that we believe impact consumers most. We have grouped some of the questions together and provided a combined answer.

4.1 Individual questions

Lessons Learnt

Question A. Did you consider that UR internal and external resources involved in the RP7 process were at an appropriate level and had the requisite expertise?

Question B. Are there any particular areas which you consider would benefit from further experience in the future along with the nature of the expertise?

The Consumer Council does not have a view on the appropriateness of the levels of internal and external resources deployed during RP7 but notes that a price control process requires specialist knowledge and inputs in a number of areas.

We support the UR in seeking guidance in such areas, including cost of capital, pensions and cost benchmarking. The Consumer Council would expect that, with the increasing digitalisation and use of smart technology, external resources may be required for RP8 in the areas of AI and cyber security.

Question C. What was your view in relation to the regularity and nature of the engagement with your organisation and with other stakeholders.

Question E. Was there a particular method of engagement which you found most effective?

As one of the members of the Consumer Engagement Advisory Panel, the Consumer Council has been involved in the collaboration to determine appropriate consumer measures and targets for RP7.

We also supported the introduction of the Evaluative Performance Framework and the related panel. Thus, we have been engaged throughout the PP7 process.

However, it is much more challenging to engage with consumers directly. We support the use of infographics and decision summaries to provide them with an overview of the impact on bills and customer service, in an easily understandable, transparent format, but recognise that this is only likely to reach a subset of consumers.

Our latest annual survey of consumer attitudes to the energy transition ²⁰ shows that women and lower income consumers are less likely to understand or be aware of the energy transition. We believe that these groups and vulnerable consumers are unlikely to engage with a price control process, emphasising the importance of the CEAP role.

Question D. Do you have any views in relation to the structure and duration of the process, including timeline for key milestones.

The timeline for RP8 is consistent with that adopted for RP7, so we will make no further comment.

Question F. Please detail aspects of the RP7 process that worked well and should be continued.

Question G. Please detail elements that you believe could be simplified or streamlined? For instance, what level of page limit would you consider appropriate for the business plan.

The Consumer Council values the ability we had to support the determination of consumer measures and targets for RP7 and expects that the CEAP role will continue for RP8.

We welcomed NIE Networks' development of an Environmental Action Plan (EAP) and would expect the UR to take account of Ofgem's approach to EAPs for Electricity Distribution Price Control (ED3 - running from April 2028 to March 2033) ²¹ to ensure that the RP8 approach remains consistent.

Our understanding of the ED3 process currently underway in GB is that Ofgem is specifying a page limit for business plans and highlighting the areas where additional supporting documentation may be required.

²⁰ [Attitudes to the Energy Transition](#), The Consumer Council, November 2025.

²¹ [Framework decision: electricity distribution price control \(ED3\)](#), April 2025, Ofgem

Question H. Your views on what you could improve on or what you would change to enhance NIE Networks' performance.

The introduction of consumer measures in RP7 is positive. These measures will help drive improvement and should be ramped up over time to increase standards even further.

The introduction of the Evaluative Performance Framework (EPF) is also positive. The EPF is designed to assess and improve NIE Networks' performance. Key aspects of the EPF include:

- **Incentives for Improvement:** The framework encourages NIE Networks to proactively pursue initiatives that benefit customers and adapt to new opportunities in the energy sector.
- **Stakeholder Engagement:** The EPF aims to integrate consumer feedback into the company's operations, ensuring that customer voices are heard in decision-making processes.
- **Accountability and Transparency:** The framework emphasizes accountability, flexibility, and balanced decision-making, which are essential for maintaining trust with stakeholders.

The EPF will challenge and incentivise NIEN and further incentive mechanisms should be considered as a means to drive good customer outcomes.

Question I. Comments on key issues for consideration for RP8.

Question J. Any other relevant factors for consideration for RP8 that we should be aware of here.

The Consumer Council would expect that lessons learnt from the Evaluative Performance Framework and the performance against consumer measures and targets would be reviewed and refined in the light of experience during RP7, particularly those measures where the targets have not yet been set.

It will be important that RP8 continues to maintain measures that support vulnerable customers, enhance the quality and scope of customer services. It should also support customers with opportunities to engage in the energy transition and enhance the connections services for both consumers and renewable generation.

We would also expect the UR to take account of the outcomes from other consultations (such as Review of Electricity Guaranteed Standards of Service and Overall Standards of Performance²²) which may impact NIE Networks' operational decisions and consumer bills in its RP8 planning, including the implications of the socialisation of connection costs and allowances for severe weather costs.

²² [Review of Electricity Guaranteed Standards of Service and Overall Standards of Performance](#), Utility Regulator, Oct 2025

Business Plan Assessment Lessons Learnt

Question K. Do you agree with the business plan assessment themes, test areas, and questions?

The Consumer Council agrees with the assessment themes, test areas and questions. In an environment where costs are increasing and there is significant change, it is vital that NIE Networks can demonstrate that its services and tariffs provide value for money for consumers as our research shows us that 32% of consumers in Northern Ireland are living in fuel poverty²³.

Similarly, the quality of NIE Networks' engagement with all stakeholders is important as it can provide clarity on what consumers need to understand, how they access customer services and how services will change over time.

Providing an explanation of past performance is critical to assessing the robustness of the company's proposals and the way it has taken account of risks, alternative scenarios and efficiency in delivery.

Question L. Do you consider the expectations categories are appropriately defined and balanced?

Question M. Do you consider the features of each category are correct?

The Consumer Council would expect to see both a "good" and "exceptional" plan specifically addressing how best to serve customers and stakeholders.

Question N. How might this be done in the future, and what feedback or suggestions do you have?

We would expect to see strong justification of self-assessment claims, supported by evidence.

Areas of work to be completed during RP7

Question O. Do you agree with the list included in table 4.1 and that it captures the full extent of the work to be included in the RP7 period as identified in the final determination?

²³ [Understanding Fuel Poverty levels and energy affordability in Northern Ireland](#), Consumer Council, November 2025

Question P. Would you like to suggest other work that is required to be completed prior to the RP8 price control period?

The Consumer Council agrees with the three customer measures identified:

- Monitor timely resolution of complaints against best practice and GB DNOs from the outset of RP7.
- Develop data collection, definitions and targets for consumer measures to apply from year 2 and 3 of RP7.
- Establish CEAP annual review and reporting on all consumer measures including proposals on resetting targets.

We highlight the importance of each of these measures spanning the full range of customer types, including vulnerable customers and those without access to digital technologies.

It will be important that the targets for consumer measures being set in February 2026 (or in year 3) are challenging yet realistic. We highlight the need for the CEAP annual reporting to be clear, concise and accessible to consumers.

In respect of the other areas of work, the Consumer Council would expect the outputs to provide sufficient evidence to demonstrate efficient performance and delivery against the RP7 business plan, so there is no adverse impact on consumer bills.

We note the use of re-openers to fund later years of IT development for RP7, for year 3 and later, and urge the UR to review proposals to confirm value for money and minimise additional impacts on consumer bills

RP8 Indicative Timetable

Question Q. Do you agree with the high-level milestones for the RP8 price control as set out above?

The timeline for RP8 is consistent with that adopted for RP7, therefore we have no further comment.

5. Contact information

If you have any questions, require further information or wish to discuss any aspect of our consultation response, please contact:

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The Consumer Council consents to this response being published.

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