

*Northern Ireland Sustainable Energy Programme*

*Consultation on extension to programme and reallocation of  
costs between customer groups, April 2015*

*Response by Bryson Energy*



**Bryson Energy** is a member of the

**Bryson**  
Charitable Group

Bryson Energy is part of the Bryson Charitable Group and is the regional energy agency for Northern Ireland. It welcomes the opportunity to respond to Northern Ireland Sustainable Energy Programme Consultation on extension to programme and reallocation of costs between customer groups, April 2015.

**Please find below our views on the questions posed.**

- 1. Respondents are asked to provide any evidence that they have in relation to the impacts that the proposals in this paper will have on the groups listed above in relation to Section 75 of the Northern Ireland Act.***

In equality considerations the Utility Regulator has a statutory duty to have due regard to the needs of vulnerable customers. This includes individuals who are disabled or chronically sick, individuals of pensionable age, low incomes and, for electricity only, individuals residing in rural communities.

Bryson Energy believe that costs allocated on the basis of 80% to domestic customers and 20% to non domestic customers will disproportionately impact all fuel poor households and in particular those requiring more intensive heating regimes due to a disability or indeed their age.

- 2. Respondents are asked to provide any further comments on the impact that the proposals in this paper are likely to have in relation to the promotion of equality of opportunity and the promotion of good relations.***

No Comment.

- 3. Respondents are asked to comment on the proposal to extend NISEP on the basis that costs associated with the scheme will be allocated on the basis of 80% to domestic customers and 20% to non domestic customers. Respondents are asked where possible to include any evidence that they might have to support their responses.***

The NISEP is an energy efficiency programme funded by all electricity customers with 80% targeted at fuel poor households. In 2012 the Department of Enterprise Trade and Investment announced that the NISEP was to be succeeded by an Energy Efficiency Obligation (EEO). To date delays in an EEO have meant that the NISEP will end before an EEO is in place. Bryson Energy do not agree that the NISEP should end in 2016, depriving Northern Ireland of £7.9M for energy efficiency programmes mainly (80%) targeted at the fuel poor and welcome the proposed extension.

Alternative proposals such as the Household Efficiency and Thermal Improvement Programme (HEaT) have been discussed as offering assistance for fuel poor households but this will need a level of grant assistance if it is to be suitable for low income households.

In addition Warm Homes, the Government's main tool for fuel poverty ended on the 31st March 2015. A new scheme, Affordable Warmth, operated by the Housing Executive and Councils was launched in September 2014 targeting those 33,000 homes in severe fuel poverty and aiming to assist 9,000 homes per annum with energy measures. There is little evidence to date that this target will be achieved and there is still uncertainty for those fuel poor households situated outside the targeted areas and over the £20,000 income threshold.

Bryson Energy believes that a threefold increase in the contribution from domestic customers would have a disproportionately greater impact on the fuel poor. Therefore, we believe that the

existing split of 80% of the costs allocated to non domestic and 20% allocated to domestic customers should be maintained for the years extension with the fuel poor benefiting from 80% of the fund.

In conclusion Bryson Energy believes that the Northern Ireland Sustainable Energy Programme should continue in its current form until such time as an equivalent scheme is introduced specifically targeting low income households in fuel poverty.

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