

NORTHERN IRELAND COMMUNITY ENERGY LTD (NICE)

COMMENTS UREGNI DRAFT FORWARD WORK PROGRAMME 2021-2022

NICE is grateful for the opportunity to comment on UREGNI's Draft Work Programme and to participate in the Consultation Webinar in January.

Context for NICE comments:

NICE believes that the forthcoming N.I. Energy Strategy should include as a priority a N.I. Community Energy Policy. Community energy development and targets must be a fundamental part of a new strategy as the way to engage and enable local communities to participate actively in determining how energy is produced and consumed while enabling changing consumption behaviours, controlling costs and redistributing profits for community benefit.

NICE recognises that the Forward Work Programme is being developed at a time when work is still ongoing to develop a new energy strategy for Northern Ireland, and a key part of that new policy needs to be to give UREGNI a stronger mandate to drive decarbonisation.

A. General observations on Draft Forward Work Programme:

1. The document goes to some lengths to explain the context within which UREGNI operates, as well as its specific role and responsibilities. This is extremely helpful for consideration of the Draft Forward Work Programme.
2. NICE would like to press the case for enhanced UREGNI powers to facilitate the development of appropriate, innovative grid infrastructure, particularly at distribution level voltages, to deliver energy and climate action policy objectives which will benefit energy end users, i.e., local communities.

It is to be hoped that the Department for Economy's developing Energy Strategy will include appropriate policy levers for this to happen.

3. The concentration seems to be on generating electricity with truly little attention given to reducing demand and improving energy efficiency. NICE believes that energy efficiency must be a key priority.
4. NICE, which runs renewable energy systems serving community groups, wants to be allowed to use spare grid capacity to send more electricity to be used for heating homes and hot water cylinders.
5. NICE welcomes moves to share electricity network data, and to review the network costs within bills, to help communities make the most of the cables and transformers they are already paying for.

6. NICE believes that grid charges should be removed for renewable electricity that is being used for heating in place of oil and gas, including the use of heat pumps, and for charging electric vehicles. Consumers need to have the choice of using clean energy, particularly that generated in their own community, instead of paying for oil and gas imports that pollute the air that those consumers breathe.

B. Specific observations on points of detail:

1. NICE is disappointed by the lack of attention given in the Plan to Strategic Objectives and projects which enable greater community participation in delivering more appropriate energy solutions.
2. NICE welcomes and supports Strategic Objective 3, Project 4, which does aim to focus on the needs of consumers and help deliver net zero (including the future of energy efficiency).

C. Observation on Consultation Webinar:

1. Community/citizen engagement and involvement appeared to be, by and large, presented as needing to be addressed by education. While education is certainly a significant aspect, NICE believes that there are many more enablers needed to place democratic control, shared benefits and active participation at the centre of energy projects.
2. Citizens should not just be defined as consumers but as active participants, or partners, in the transition to a low carbon economy.

NICE will be pleased to engage with UREGNI in the future as the Work Programme is finalised and implemented.

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Chair
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February 2021