

Summary of FWP responses received directly or via CitizenSpace (excludes those respondents who asked that their responses be regarded as confidential)

No.	Organisation	Response
1	Smart Grid Ireland	<p>SMART GRID IRELAND RESPONSE TO UTILITY REGULATOR DRAFT FORWARD WORK PROGRAMME 2022 – 2023</p> <p>Introduction Smart Grid Ireland welcomes the opportunity to comment briefly on the Utility Regulators draft forward work programme 2022 – 2023. We intend only to restrict our general comments towards Strategic objective 2 and Strategic object 3. From a business perspective we suggest that the scope and anticipated outcomes for each project is too general in nature while we recognize the limitations placed on the regulator in executing their responsibilities. We recognize that the forward work plans are operating within the limitations of the current regime but a radical change is needed if NI is to meet its legislative targets and investments which are delivered through the regulatory process.</p> <p>General Response While the regulator operates within current energy policy and the actions plans tabulated by government, our specific concerns are related to the restricted mandate of the Utility Regulator which we suggest is a barrier to progress on many fronts and urgent action is needed on this. While the government’s action plan commits to reviewing legislation and regulatory requirements in 2022, it will take much longer and this and this is a serious concern.</p> <p>For example</p> <ul style="list-style-type: none"> • Most of the actions in the government’s action plan were enabling. Eg: Carrying out reviews with little tangible progress on the ground within the sector in 2022. There is a need for urgent implementation on the ground. • There is little clarity on the mix of technologies we are aiming for in the energy system by 2030. At least 70% renewables – but how much share of wind, storage, solar, heat networks / heat pumps and what can the regulator do to influence this. • Need targets set for how many electric vehicles / charging infrastructure by 2030 so appropriate investments can be made. The same goes for other low carbon technologies. • Barriers to connections in NI is also a major disincentive to investment and while this is being reviewed by the Dept of Infrastructure, there needs to be an integrated approach to make sure the goals of the energy strategy are reflected in the review – How much of this can the regulator influence as the intermediary between the customer / investor and the policy makers.

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		<p>With regards to updating the license obligation that SONI operates under, it is important that a set time limit is placed on the operator to carry out a survey as the current time lag between making an application and a survey being instructed, is from experience, much too long.</p> <p>A recent experience by one of our members companies highlights this problem in the gas network. A large multinational company, wishing to reduce their carbon foot-print and save money from using a legacy coal fired system could save approximately £2 million per year in heating costs by switching to using gas in the interim. The gas pipe travels through their site buried. After approximately 9 months from an application, they received a letter from the regulator today to say that a surveyor had still not been appointed. The delays in this process may comply with legislation in 2015, but it is certainly not compatible with a modern economy and a competitive Northern Ireland. I suggest that these types of delays whether in Electricity, Gas or water needs to have time limits on survey's and connections. I trust these few granular examples will be considered helpful as you address the scope and anticipated outcomes on the forward work programme.</p>
2	NIE Networks	<p>Draft Forward Work Programme 2022-23</p> <p>NIE Networks welcomes the opportunity to comment on the Utility Regulator's (UR) Draft Forward Work Programme (FWP) 2022-23. Our comments are as follows.</p> <ul style="list-style-type: none"> • We appreciate that it will have been difficult for the UR to consider and address implementation of the Department for the Economy's (DfE) Energy Strategy¹ in its draft FWP, given that the Energy Strategy was only published a few days ahead of the FWP. However, it would seem appropriate for the UR to re-consider if it needs to adapt or re-focus its FWP in such a manner to make the Energy Strategy implementation more central. • In the list of organisational projects at section 5 of the draft FWP, the UR states that it will work '<i>with DfE and stakeholders to review the appropriateness of [the UR's] vires in light of emerging energy and climate change policy</i>'. This is to ensure the UR's '<i>... vires appropriately aligns with energy and climate change policy</i>.' We welcome this review of the UR's legislative remit and we support extending the remit to include consideration of achieving net zero carbon and wider economic development. However, we understand the UR's expectation is that this project may take several years to conclude. So, we would suggest that in the meantime – bearing in mind the urgency to progress the transition of the local energy system to net zero carbon – the UR in conjunction with DfE, should work to broaden to the extent possible their interpretation of the UR's existing mandate, and take as balanced and holistic view as possible of what it means to '<i>[protect] the interests of electricity consumers...</i>'

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		<ul style="list-style-type: none"> • There is no mention in the FWP of the following important projects: (1) reform of distribution connection charging policy; (2) smart metering; and (3) review of electricity network tariff structures. With regards to the review and potential reform of distribution connection charging policy, this should be prioritised within the UR’s FWP as the current framework for connection charges presents a potential serious impediment to economic development in Northern Ireland. With regards to smart metering, we would reiterate the importance of developing a definitive NI strategy as soon as possible. Metering is the source of key data for the energy sector and smart meters are likely to be an essential component of the energy transition – without them it is questionable if the energy system could become truly digitalised. <p>With regards to the review of network tariffs, this an important work stream in the context of the energy transition, and reforms may be needed to ensure that costs associated with the network are fair to all customers. The UR’s involvement in this work stream should also be prioritised. We would ask that the UR gives these important projects the focus and attention they require in the year ahead.</p> <p>1 ‘Energy Strategy for Northern Ireland. Path to Net Zero Energy.’</p> <ul style="list-style-type: none"> • The FWP highlights the need for the adequacy of UR staffing and resourcing to be considered and associated budget implications. NIE Networks fully endorses the need for the UR to ensure it has sufficient resources to meet the growing regulatory workload that is required to proactively drive forward DfE’s Energy Strategy and the broader energy transition. • We note the UR’s project to implement best practice Guaranteed Standards of Service (GSS) for electricity. We look forward to engaging with the UR on this important project, in tandem with the development of the RP7 price control where we can address the additional cost implications that enhanced GSS may lead to. • We reaffirm our support and commitment to the UR’s Consumer Protection Programme (CPP) and to the protection of vulnerable consumers. We will continue to engage actively with the UR as it implements the CPP. We also recognise that customers need to be protected through the energy transition and welcome further engagement with the UR to take this policy development forward. Beyond the points made above, we would also like to acknowledge the very positive engagement we have had working together with the UR in the past 12 months, on the NI ‘Green Recovery’ initiative. This will bring forward significant investments in the electricity network to help support future needs in light of the net zero ambitions in DfE’s Energy Strategy. These investments will also have a positive impact on the NI economy, and create a significant number of local jobs. In a similar vein, we look forward to continuing the positive engagements with the UR as we work towards developing a transformational RP7 price control for the period 2024 to 2030, in order that we are best
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		<p>placed to meet the considerable challenges and ambitions outlined in DfE’s Energy Strategy, and continue delivering good customer outcomes.</p> <p>We face a challenging but also exciting period ahead. But we are confident that we and the UR can work constructively to address these challenges – for the benefit of everyone in Northern Ireland.</p>
3	GNI (UK) Limited	<p>Draft Forward Work Programme 2022-2023</p> <p>GNI (UK) welcomes the opportunity to provide feedback on the Utility Regulator’s (UR) proposed work programme for 2022-2023. Having attended the February stakeholder workshop and reviewed the consultation paper, we make the following observations in relation to the key actions associated with the gas network operators:</p> <p>Strategic Objective 3, Action 3: Support DfE in the implementation of a consumer-centric energy strategy to help deliver net-zero</p> <p>GNI (UK) is committed to working with UR, DfE and all TSOs and DSOs in relation to the future NI Energy Strategy. GNI (UK) notes the very positive and welcomed ambitions associated with delivering a net-zero energy strategy and views it as important that all relevant stakeholders are fully resourced as part of GT22 to carry out the various workstreams associated with this strategy in order for it to be implemented successfully and fit for purpose.</p> <p>Strategic Objective 3, Action 4: Implement changes to existing framework to facilitate injection of biomethane onto the gas grid. Liaising with Regulated companies, DfE and interested stakeholders to ensure policy alignment</p> <p>With the expectation of first injection of biomethane on the gas grid in 2022, GNI (UK) are committed to ensuring that the relevant framework is in place for shippers to have the ability to avail of biomethane injection. GNI (UK) will continue to work with our partners to ensure that the framework is fit for purpose on a forward looking and ongoing basis.</p> <p>As a general observation on the Forward Work Programme, GNI (UK) recognises the important juncture all stakeholders are at presently particularly in relation to emerging energy and climate change policy and we look forward to working closely with all stakeholders involved to best achieve these ambitions.</p> <p>Please do not hesitate to contact me in relation to any of the points included above.</p>
4	SONI	<p>We set out our full support for these workstreams below, to emphasise their importance and to secure their prioritisation during the upcoming year.</p> <p>Strategic objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes</p> <p>SONI is the operator of three all-island markets: wholesale electricity; capacity and system services. Projects 5 and 6 under UR’s Strategic objective 1 will require significant implementation work by SONI and joint development of solutions. We are already working closely with the UR and with our counterparts in Ireland to unlock the benefits of these changes for consumers.</p> <p>• Project 5: Future arrangements for system services – this project will deliver a system services market that is consistent with the European target market and which will allow NI consumers to benefit from wider competition in the system services market. These arrangements will also provide an investment signal that should ensure that the DfE target of more than 70% renewables by 2030 can be achieved. This project is therefore essential for compliance, attracting necessary investment and ensuring a just transition. It is therefore vital that sufficient resources are provided at all levels in the UR, and that SONI is also provided with the resources necessary to ensure</p>

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	<p>it is able to implement the SEMC decision in an efficient and timely manner. Further details on the importance of this work can be found on page 123 of our Shaping Our Electricity Future' Roadmap.</p> <ul style="list-style-type: none"> • Project 6: SEM – GB trading arrangements – this project has the potential to mitigate the inefficiencies introduced to cross-border trading created by Brexit. Improved market efficiency should result in savings/avoided costs for NI customers of many millions per year. While this is a complex political space, the UR should recognise the potential value that can be achieved through timely delivery of revised trading arrangements and use its influence to secure a positive outcome for NI consumers. SONI will happily support the UR in these endeavours and will implement the eventual solutions if these fall within our remit, noting that to date no funding has been provided for this work. The issues associated with inefficient trading between the SEM and GB are set out on page 136 of our Shaping Our Electricity Future' Roadmap. <p><i>Strategic objective 2: Enabling 21st century networks</i></p> <p>SONI is responsible for planning and operating the electricity transmission system for Northern Ireland. We also collect and publish substantial volumes of data relating to the electricity system. Our observations on the projects prioritised under this Strategic Objective are made as a key stakeholder in this area.</p> <ul style="list-style-type: none"> • Project 1: Digitalisation strategy for electricity network – SONI currently publishes a significant volume of system and market data across both the SONI and SEMO websites. SONI looks forward to working with the UR and NIE Networks to enhance the data available to stakeholders and simplify access. SONI would emphasise that the approach should align with the NI Energy strategy requirements in relation to data and digitalisation to ensure that the whole of the energy supply system is assessed and that the solution complements the delivery of the 'one stop shop'. SONI considers that this can be achieved through engagement with a wider range of stakeholders. <ul style="list-style-type: none"> • Project 3: RP7 Price Control. – this price control will be an important enabler of the delivery of the NI Energy Strategy. This price control has the potential to unlock opportunities for the industry and benefits for consumers. It would therefore be helpful if the UR could share the timetable for this work with stakeholders to provide an understanding of the timing of consultations. It is vital that stakeholders are provided with sufficient time to understand and respond to the UR's proposals while ensuring that all formal processes are completed before the start of the new period. • Project 5: Governance of SONI – SONI will continue to engage with the UR on this process. <p>SONI Response to UR Draft Forward Work Plan 2022-23 6</p> <p><i>Strategic objective 3: Ensuring security of supply and a low carbon future</i></p> <p>As mentioned above, SONI plays a significant role in ensuring a secure and stable low carbon supply of electricity in Northern Ireland. We have set out how we plan to contribute to our low carbon future in Northern Ireland in our Shaping our Electricity Future Roadmap, which links to the following projects in the UR's Forward work Plan:</p> <ul style="list-style-type: none"> • Project 1: SEM Capacity Auctions –SONI is working closely with UR and will continue to do so. We are dependent on UR decisions in this area to allow us to fulfil our obligations under licence and the capacity market code. It is vital that the future capacity auctions
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	<p>deliver a diverse range of technologies to meet the needs of a modern 21st century safe, secure, efficient and reliable system with increasing levels of renewable generation whilst protecting the interests of consumers.</p> <ul style="list-style-type: none"> • Project 2: DSU participation in wholesale markets - SONI supports the participation of demand side units in all of the markets that we operate and look forward to working with the UR to unlock the further value that these units have the potential to provide. • Project 3: Implementation of NI Energy Strategy – The UR plays a pivotal role within the energy industry in Northern Ireland and it is vital that it devotes sufficient resources to all of the projects identified in this plan that will contribute towards the decarbonisation of our energy system, some of which are listed as stand-alone items. However, we also note that some aspects of the strategy are not included within the UR’s plan for 2022/23, these gaps include the review tariff structures and the development of a regulatory framework for offshore generation. It would be helpful for stakeholder if timelines for these items could be provided. <p>Organisational Projects</p> <ul style="list-style-type: none"> • Project 2: Review of UR Vires – we welcome the review of the UR’s vires, while noting the impact that the current absence of an executive and the scheduled election might have on the ability of the UR and DfE to deliver this legislative update. Therefore in the meantime we would encourage the UR to provide clarity around how it has regard to its current duties in relation to innovation and sustainability when making its decisions. This will help to ensure that progress can be made towards decarbonisation targets in the short to medium term. • Project 3: Review of Project Management – SONI’s recent response to the consultation on modifications to our licence highlighted our concerns on the delays to the price control process. Both customers and the industries that serve them rely on timely decisions by the UR to underpin efficient delivery of benefits. SONI therefore welcomes the UR’s focus on improving its organisational effectiveness. <p>SONI Response to UR Draft Forward Work Plan 2022-23 7</p> <p>3. Range of Proposed Projects SONI broadly supports the range of projects proposed by the UR for this forward work plan. Delivering on the work items set out here will provide important certainty for licensees, shareholders and consumers. We note however that a number of other deadlines that the UR set during 2021/22 in relation to SONI have been missed. We would strongly urge the UR to ensure that it has sufficient resources to deliver the final plan that it sets out for 2022/23 and that the timelines have been challenged to ensure that they are realistic and achievable. Any changes to this prioritisation or delays to delivery should be communicated to stakeholders in a timely and transparent manner which allows them to mitigate, where possible, the impact of those changes. We note that the UR has not included the development of the framework for offshore generation or the review of electricity tariffs within its plan for 2022/23. These are important enablers of our transition to a low carbon economy and it would be helpful if the UR could provide a status update for these items to allow stakeholders to plan their resourcing accordingly. SONI Response to UR Draft Forward Work Plan 2022-23 8</p> <p>4. Other Comments</p>
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		<p>The timely and well-informed decisions made by the UR can have a positive impact on both consumers and industry stability that far outweighs the cost of the resources that the UR requires to deliver effectively. SONI would urge the UR to make all efforts to secure the necessary specialist and project management resources to secure timely delivery of this plan.</p>
5	Mutual Energy	<p><u>Mutual Energy comments on UR draft Forward Work Programme 2022-2023</u></p> <p>The Utility Regulator’s draft Forward Work Programme 2022-2023 (the “draft FWP”) was published a only few days after the NI Energy Strategy. It would be prudent to review the FWP considering the policy initiatives outlined in the energy strategy and revise the work programme as necessary. Some examples of potential inconsistencies include:</p> <ol style="list-style-type: none"> 1. The Energy Strategy commits to offshore wind forming a part of the electricity generation mix and the Energy Strategy Action Plan builds on this with Action 14 aiming to deliver 1GW of offshore wind from 2030. Combined with Action 21 (Review legislation and regulation requirements in the context of energy decarbonisation goals) there is important and early work required from the Utility Regulator to start considering the future regulatory regime for both offshore wind and associated offshore transmission. 2. The Energy Strategy notes the commitment of government to work with the gas sector to understand viable pathways to fully decarbonise gas. There is not a similar commitment from UR in the draft FWP however. Including such a commitment would ensure the required regulatory support was available to NI Gas Network Operators to deliver upon this policy objective. 3. The FWP does not mention hydrogen despite the prominent role it plays within the wider policy vision set out in the energy strategy. A further action for UR to work with gas network operators and support them with appropriate hydrogen innovation, such as assessing existing network capabilities and the capital works required to support hydrogen policy objectives, including the feasibility of network repurposing. 4. National Grid plans to convene ‘Regional Steering Groups’ (one of which shall cover ‘Ireland’) to formalise engagement across jurisdictions impacted by the transition plan for the GB gas network. Ireland, and more particularly Northern Ireland, is reliant on gas imports from GB to meet energy demands (both gas and electricity). The transitioning of the GB gas network is therefore a critical security of supply concern for Northern Ireland. A commitment for UR to formally engage with National Grid and Ofgem on these matters and to support the NI gas TSOs to liaise with their GB counterparts on these matters (both network operators and regulatory authorities) to ensure a safe and secure transition would seem a prudent step. <p>Some specific inconsistencies include:</p> <ul style="list-style-type: none"> • Strategic objective 2, Action 2 (to “<i>put in place a customer focused framework to deliver a digitalisation strategy for the electricity network</i>”), should include the gas network also. This will ensure it is consistent with the Energy Strategy Action Plan, in particular, items 19 (Smart Systems and Flexibility Plan) and 20 (smart meters), which both include references to the gas network (and not just the electricity system).

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		<ul style="list-style-type: none"> • Strategic objective 3, Action 4 (to “<i>complete work on reviewing the gas regulatory framework to facilitate possible biomethane injection</i>”), should be expanded to include the further work necessary, following establishment of initial operational arrangements, to further refine commercial and regulatory arrangements to ensure biomethane can be quickly scaled up in Northern Ireland to maximise its potential decarbonisation benefits for heat and transport (e.g. bio-CNG). <p>While not directly related to the NI energy strategy, Mutual Energy believe there would be merit in UR considering how improved coordination between electricity and gas TSOs in Northern Ireland could be delivered. This will help ensure robust security of energy supply is maintained throughout the energy transition. Longer-term issues that may benefit from a more coordinated approach include:</p> <ol style="list-style-type: none"> 1. Ongoing gas supplies to support power generation over the short to mid-term, particularly within the context of the anticipated wider decarbonisation of GB gas supplies during the 2020s and 2030s. 2. The timeline for the phasing out of natural gas use in power generation in Northern Ireland and the approach to the introduction of alternative fuel sources – e.g. hydrogen. This will also require extensive collaboration with NI power generators. 3. Coordination of ramp up of hydrogen production, storage and gas network repurposing. <p>Mutual Energy appreciate that further widespread consultation on the FWP may be undesirable at this stage and suggest targeted engagement with stakeholders could be undertaken with regards to potential amendments, and/or any specific changes suggested by respondents as part of the consultation process.</p> <p>Mutual Energy would be happy to engage further with UR on any of the above, or other related matters, if useful.</p>
6	Power NI	<p>Draft Forward Work Programme 2022 – 2023</p> <p>Power NI welcomes the opportunity to respond to the recent draft Forward Work Programme (FWP) published by the Utility Regulator (UR). Power NI also recognises this year’s FWP is set against what has been another challenging year especially in the context of energy prices. Power NI welcomes that the 2022-2023 FWP is as expected and contains no regulatory shocks. It follows on from previous FWPs and is consistent with the UR’s Corporate Strategy.</p> <p>The 2021-22 FWP contains several strategic important projects which have a direct impact on Power NI.</p> <ul style="list-style-type: none"> • The Retail Electricity Market <p>The UR has highlighted that it will continue work to ensure that it balances competition with consumer protection and promote markets that deliver effective competition, informed choice and fair outcomes. Power NI fully supports this aspiration.</p> <p>- Consumer Protection</p> <p>The UR’s Consumer Protection Programme has several projects to be completed. Power NI has engaged with the UR throughout the Consumer Protection process and will continue to work with the UR to deliver the detailed goals of the programme. 2</p>

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		<p>Power NI welcomes the work already completed to date on Consumer Protection as with last year however, as stated last year, it is disappointing that the UR’s review Guaranteed Service Standards (GSS) has not yet concluded.</p> <p>The GSS regime offers an opportunity to define how NIE Network’s provide network related services to customers both in terms of general reliability and quality as well as services requested via the customers supplier. At present there is little reporting or transparency in relation to NIE Networks performance against the GSS and no opportunity for suppliers to input into or change the setting of standards. Suppliers have the most interaction with customers and any perception of poor service by NIE Networks is reflected on the supplier. It is therefore crucial that the UR implement a process which facilitates scrutiny and review.</p> <p>- Innovation in energy markets and licences</p> <p>The new Strategic Energy Framework and development of the energy transition will require new and innovative regulatory approaches. Innovation will come from electricity suppliers who have both the relationship with the customer and the inherent ability to offer aggregated routes to market. The immediate difficulty is that in many instances and in Power NI’s case, the electricity licence regime either restricts or prevents solutions being brought forward.</p> <p>The UR has included an Organisational Project which refers to aligning the vires of the UR with government policy in relation of energy and climate. Power NI would urge the UR to progress this project as a matter of urgency. Only with the appropriate vires can the UR make the required licence changes and have the necessary discretion to facilitate the energy transition. Without this the UR could potentially frustrate innovation and market developments.</p> <p>Conclusion</p> <p>Power NI is committed to working constructively with the UR across the range of projects referenced in the FWP and hopes that the UR will address those issues highlighted above.</p> <p>Should you wish to discuss the content of this response please do not hesitate to contact me.</p> <p>Yours sincerely</p>
7	The Consumer Council	<p>1. EXECUTIVE SUMMARY</p> <p>The Forward Work Programme (FWP) is the Utility Regulator’s (UR) business plan for the third year of their Corporate Strategy 2019-24. The FWP sets out the non-routine projects the UR would like to undertake in the forthcoming year.</p> <p>The Consumer Council are responding to an ambitious programme of projects that the UR wish to carry out over the next year, and delivering these projects will enable the UR to meet their strategic objectives of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Promoting markets that deliver effective competition, informed choice and fair outcomes <input type="checkbox"/> Enabling 21st century networks <input type="checkbox"/> Security of supply and a low carbon future. <p>We welcome the recent deepening of collaboration between the UR and the Consumer Council. We are committed to continue to further enhance our collaborative engagement to ensure the key strategic objectives and organisational projects outlined in the UR FWP and those of the Consumer Council, are delivered to the benefit of consumers.</p> <p>There has never been a more important time for the UR and The Consumer Council to protect the interests of consumers across Northern Ireland and therefore there is a need for strong working partnership between us.</p>

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		<p>The UR outlines the important context of today’s economic, social, and political environment and how it is affecting consumers. This includes the considerable increases in energy prices, the energy transition towards delivering net zero, and the continuing impact of EU exit and Covid-19.</p> <p>The UR puts consumers at the centre, with a commitment to protecting those most vulnerable, which The Consumer Council fully supports. Within the context of ever increasing energy prices, we believe there is a significant risk of consumer harm. It is more important than ever that the UR continues to work in partnership with stakeholders including The Consumer Council to understand the key areas affecting consumers and develop sustainable solutions to help support those in need. 3</p> <p>We use a set of eight guiding principles developed by the United Nations to assess where the consumer interest lies, and develop and communicate our policies, interventions and support. These provide an agreed framework through which we approach regulatory and policy work.</p> <p>Figure 1: Consumer Principles</p> <p>The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.</p> <p>They serve to protect consumers, setting out the minimum standards expected from markets when delivering products or services in Northern Ireland. They also frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.</p> <p>The Consumer Council recommends that the UR adopts these eight principles as part of its approach 5 when delivering its Forward Work Programme for 2022/23. These principles will support the UR with its delivery of the FWP and its outcome based approach outlined as part of the UR’s 2019/24 Corporate Strategy. For instance, it will help focus the UR’s activity that seeks to increase regulatory protection for vulnerable consumers. It is vital that The Consumer Council and the UR work together throughout 2022/23 to protect all consumers across Northern Ireland especially the most vulnerable consumers.</p> <p>The Consumer Council welcomes the opportunity to review the draft FWP list of projects that the UR propose to do during 2022-2023 and is published for consultation.</p> <p>As the statutory consumer body for electricity, gas and water consumers, The Consumer Council looks forward to working with the UR on its areas of regulatory responsibility. We would like to strengthen the existing partnership approach between both organisations so that consumers benefit from electricity, gas and water markets which meet their needs. 6</p> <p>3. SECTION ONE: RESPONSE TO BUSINESS PLAN PROJECTS</p> <p>Strategic objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes</p> <p>3.1. The Consumer Council supports the UR’s Consumer Protection Programme (CPP). This programme must maintain and improve safeguards for consumers. The Consumer Council will continue to work closely with the UR to ensure this project delivers benefits for consumers and that consumers get the practical support they need, especially those in vulnerable circumstances. We look forward to providing a response to the Best Practice Framework Programme consultation in April 2022. We also look forward to continuing to Chair the Consumer Vulnerability Working Group and working with UR to deliver improvements in the identification and support provided to consumers in vulnerable circumstances.</p>
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		<p>3.2. The Consumer Council welcomes the continued consumer insight tracker research, and we will continue to share our relevant qualitative and quantitative research with the UR to help identify the keys issues facing consumers. This will better inform what interventions are needed to better protect consumers now and in the future.</p> <p>3.3. The Consumer Council fully supports the project investigating domestic consumer experience of debt, particularly given the risk that the continuing impact of Covid-19 and the cost of living crisis will result in more consumers falling into debt. This research aligns with research that the Consumer Council is undertaking into the levels of, and reasons for, prepayment consumers in Northern Ireland self-disconnecting from or self-rationing their heating or electricity. These research projects will better inform interventions to support these consumers. It is important that consumers continue to be treated fairly and supported fully when experiencing debt.</p> <p>3.4. The supplier price control reviews play an important role in ensuring consumers pay as low a price as possible for the energy bills. Given the increasing energy costs, the role of price protection is even more important. The Consumer Council looks forward to working with the UR in this area and representing consumers in the regulatory process throughout 2022/23.</p> <p>3.5. The Consumer Council continues to support the projects that aim to ensure that the Single Electricity Market (SEM) is working effectively and efficiently and providing competitive arrangements. It remains essential that these projects focus on consumer outcomes and act to protect the interests of NI energy consumers. Any issues affecting consumers across Northern Ireland must be addressed quickly.</p> <p>Strategic objective 2: Enabling 21st century networks</p> <p>3.6. The Consumer Council welcomes the UR establishing a customer focused framework to deliver a digitalisation strategy for the electricity network. It is important that the consumer remains central to such a programme, and particular attention is paid to the impact on vulnerable consumers and their ability to interact with a digitalised system. It is also important that the cost of the strategy is fully considered, is affordable to all consumers. The Consumer Council looks forward to being involved with the development of the strategy.</p> <p>3.7. Network price controls are important to enable investment in modern infrastructure networks and will increase in importance with the move towards net zero. However, the outturn of the price controls must be affordable for all consumers and at delivered efficiently. The Consumer Council looks forward to taking part in these price control activities and discussing how best to develop plans that lead to an infrastructure that improves the quality of service consumers receive and in a way which does not mean consumers will struggle with their future energy bills.</p> <p>3.8. We look forward to working with UR on the ongoing delivery of a consumer centred PC21 with clear performance commitments, the Living with Water Programme, and the Long Term Water Strategy.</p> <p>3.9. The Consumer council supports the intent behind the governance reviews the UR is undertaking into SONI. NI consumers are entitled to robust governance arrangements that can ensure SONI's strategies, policies and projects are fully aligned to their needs.</p> <p>3.10. The Consumer Council welcomes the project to implement a best practice Guaranteed Standards of Service for electricity consumers. With increasing energy costs, consumer engagement with their supplier may increase, and guaranteed standards of service</p>
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		<p>will ensure that service remains consumer focused. The Consumer Council looks forward to being involved with the development of the best practice framework.</p> <p>Strategic objective 3: Ensuring security of supply and a low carbon future</p> <p>3.11. The Consumer Council supports the SEM capacity auctions. It is important that security of supply is maintained, but it is equally important to get value for money at the lowest cost for the consumers and small businesses as we decarbonise our energy systems.</p> <p>3.12The Consumer Council is committed to work in collaboration with the UR to support the Department for the Economy (DfE) in the development and implementation of the Northern Ireland Executive's Energy Strategy - Path to Net Zero Energy. Throughout this work the Consumer Council will seek to ensure delivery of a just and affordable energy transition where security of supply is guaranteed.</p> <p>4. SECTION TWO: ORGANISATIONAL PROJECTS</p> <p>4.10. The Consumer Council fully supports future engagement with the UR to deliver initiatives to provide practical support to consumers. The Consumer Council is committed to collaborating with the UR and other stakeholders to develop and deliver support and information for consumers to help them access fair and affordable energy prices.</p>
8	NEA NI	<p>Unfortunately, many households in Northern Ireland face the prospects of cold homes, especially during NEA welcome the opportunity to respond to the Utility Regulator's Draft Forward Work Programme (FWP) 2020–2021. NEA work closely with the UR across many aspects of our work, but especially in relation to consumer protection and policy development. We value the strong working relationship we have developed and look forward to continuing to work together in the coming years as we strive to eradicate fuel poverty in Northern Ireland.</p> <p>NEA broadly agree with the context that the paper outlines and we believe the projects identified are required. We have made some comments around the objectives in the draft Forward Work Programme and have included some suggestions which we feel are worthy of consideration and may enhance the Forward Work Programme 2022–23.</p> <p>With the launch of the Department for Economy's new Energy Strategy, energy policy in Northern Ireland is set to embark on the most dramatic period of change in Northern Ireland's history. Whilst this change will bring many opportunities for energy consumers including, access to clean fuels, the role out of new home heating technologies and improvements to the existing energy infrastructure; it also presents a number of challenges and risks for which consumers will need support to overcome. This is a pivotal moment for the energy sector and in particular, the UR. In this changing landscape, it is crucial that the UR protects low income and vulnerable consumers and that the costs of these changes are fairly distributed across energy bills. All those contributing to the change should benefit from the decarbonisation agenda.</p> <p>In general, NEA believe there is a need to ensure that existing consumer protections (across all utilities) are maintained and strengthened. In comparison to other countries Northern Ireland has a very small retail market and therefore does not benefit from economies of scale. For this reason, we consider that it is unlikely to attract enough suppliers for competition alone to form the basis of consumer protection. Therefore, we consider that the best way to protect domestic consumers (and in particular those who may be vulnerable) is to maintain high standards of regulation, including price controls on the biggest supplier.</p> <p>Crucially we believe that where new technologies and markets emerge, regulations should be updated to ensure there are no gaps or unintended consequences for consumers. NEA will continue to urge the Department for Economy to work with the Utility Regulator,</p>

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	<p>Consumer Council and wider stakeholders to identify and plug any 'gaps' in consumer protections that emerge as the energy system changes.</p> <p>All low carbon heat solutions will require changes to consumer's heating systems in their homes, which may impact on comfort factors or the responsiveness of the system. Consumers will also be required to change their behaviours, including using less energy and adopting more energy efficient lifestyles. It is our belief that all households in Northern Ireland will need support to decarbonise, but it is of paramount importance that those considered the most vulnerable are supported first and foremost and the UR can and should play a significant role in ensuring this process.</p> <p>NEA believe that energy efficiency should be considered the 'first fuel'. We know that energy efficiency improvements offer a tried and tested cost-effective approach to reducing household energy consumption, whilst also alleviating the hardships on fuel poor households and contributing to ensuring warm, safe, and healthy homes. The emerging technologies will not offer affordable energy for many households in Northern Ireland without widespread energy efficiency improvements. Fixing Northern Ireland's cold, damp and leaky homes will therefore be imperative if we are to ensure a 'just transition'. Doing so will assist in unlocking several wider social and economic benefits, lifting households out of fuel poverty, reducing the burden on the NHS and freeing up household incomes which can be reinvested in their local communities.</p> <p>At this point we wish to reiterate the importance of programmes such as the Northern Ireland Sustainable Energy Programme (NISEP) in addressing fuel poverty in the longer term. NEA's Energy Justice Campaign (EJC) has worked persistently to highlight the importance that the NISEP continues to play as a key intervention in improving energy efficiency, particularly in vulnerable households. We therefore consider it a matter of priority that further information be provided on the plans for the existing NISEP. The support the programme provides to vulnerable households cannot be underestimated and as such we reiterate our call to keep the NISEP in place until such times as an alternative scheme is developed.</p> <p>NEA welcome the commitment to complete a project on domestic consumer experience of debt. This research project will provide a useful tool to inform interventions to support domestic consumers. This will be of particular value in the context of the ongoing energy price volatility which looks set to continue for the foreseeable future. However, NEA would also like to see further efforts to obtain more detailed information and data around vulnerable consumers' use of pre-payment meters and the levels of self-disconnection in Northern Ireland. With currently 45% PPM customers in the electricity market and 62% in Gas Greater Belfast and 82% in Gas Ten Towns, we believe there is a need for further exploration into the range of aspects of coping with a PPM. To date we still don't have enough information to adequately assess the degree of self-disconnection, rationing, consumer behaviour, accessibility, ease of use, PayPoint issues and many other aspects. This project should also look at other programmes to tackle debt such as through extending the use of Fuel Direct.</p> <p>We are pleased to see a commitment to put in place a customer focused framework to deliver a digitalisation strategy for the electricity network. SMART Meters have been shown to make a positive impact for fuel poor homes in the UK and it is an area in which Northern Ireland has been caught lagging. There is however also a need to tackle the gas network, where many consumers are stuck with outdated meter boxes. The Pandemic shone a spotlight on the inadequacy of the 'dumb' gas PPM's, which included the need to physically top up with an individual needing to take the prepayment card to a PayPoint, the maximum vends of £49, the individual needing to take the card to the meter, which is normally positioned outside the house and often in a hard-to-reach location.</p> <p>We also support the project to deliver effective licence obligations to reflect the outcome of the SONI Governance review. As the electricity Transmission System Operator (TSO) for Northern Ireland, SONI has a critical role to play in the delivery of Northern Ireland</p>
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		<p>energy policy and enabling a successful energy transition. To fulfil this role and discharge its duties effectively, it is vital that SONI's governance arrangements are effective in protecting Northern Ireland consumers both now and in the future.</p> <p>Below we outline some additional points which we believe deserve consideration by the NI Executive, the Department for Communities and the Northern Ireland Utility Regulator. It is our belief that these options will assist in easing the pressures on vulnerable energy consumers in Northern Ireland in the longer term, and we would like to see them reflected in some way within the FWP.</p> <ul style="list-style-type: none"> • Consideration should be given to the Introduction of the Warm Home Discount scheme (or equivalent) in Northern Ireland. The WHD provides for mandatory social price support to reduce energy bills for the most vulnerable. Qualifying households in GB receive a £140 discount on their electricity bill between October and March. Each year the scheme supports 2 million homes, helping more than 600,000 poorer pensioners⁶. Currently vulnerable households in Northern Ireland do not receive this support. • UR should carry out a review of the current system of regulation in Northern Ireland and assess how this compares with the protections provided by the Energy Price CAP in GB. The price cap sets a limit to how much energy firms can charge customers for gas and electricity and was introduced in 2019 to help households who do not regularly switch suppliers. Ofgem, the energy regulator, determines the level of the cap twice a year, and it is adjusted in April and October. Crucially this means price rises are passed through to consumers at set periods, meaning consumers have more time to prepare and react. In contrast, in Northern Ireland we have seen a rapid rise in energy prices throughout the winter months. This has meant many consumers have been caught unaware and faced extended hardship this winter. This is yet another example of households in Northern Ireland being further disadvantaged in comparison to their GB counterparts, as they cannot avail of the additional protections provided by the price cap. • Implement a new social tariff to help make energy more affordable for a discrete and well-defined set of energy customers. In the 2000s, the UK Government and Ofgem introduced voluntary social tariffs in the energy sector as a form of 'social price support' for vulnerable consumers. This represented an attempt by Government to protect the poorest consumers from fuel price rises without the need to interfere in the market or invest excessive amounts of public money. <p>Finally, we welcome the continued work of the Consumer Vulnerability Working Group and look forward to the partnership opportunity this provides NEA and others to provide advocacy for consumers and liaise with industry.</p> <p>We thank you for the opportunity to respond to you with these comments.</p>

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10	NI Business Alliance	<p>The Business Alliance¹ welcomes the opportunity to respond to Utility Regulator’s (UR) draft forward work programme 2022-23 (DFWP)</p> <p>Against the background of challenging political and economic circumstances, Northern Ireland is about to embark on a substantial transformation towards a net a zero-carbon economy. With extreme volatility in energy markets globally and an Energy Strategy and Action Plan recently published locally, the DFWP has a critical role to play in the year ahead.</p> <p>Given the foregoing, upon a review of the DFWP, the Business Alliance would make the following observations and recommendations:</p> <ol style="list-style-type: none"> 1. The Execution of the Energy Strategy: We note a number of references to the Energy Strategy in the DFWP, however, given the delayed publication of the strategy coinciding with the DFWP, the UR should conduct a review to ensure the delivery of the energy strategy is adequately covered 2. Biomethane Injection: Specifically on page 19 of the DFWP, it references taking 12 months to explore the barriers to injecting biomethane to the grid. It is our view that this needs to be approached, and change delivered, with greater urgency, particularly in the context of how far Northern Ireland is relative to Great Britain, where this has been done for a decade, and relative to Ireland, where it has been possible for a number of years. 3. The Powers of the Regulator: Industry has long been calling for the vires of the UR to be expanded to address the challenges of delivering net zero. While references to a review of the vires of the regulator are welcome, it needs to be addressed with urgency. The role of the UR needs to be expanded to include decarbonisation as a strategic priority, in addition to consumer protection. Broadening its mandate in NI is an opportunity to build a regulatory framework that is innovative and strategic, using regulation to facilitate a green economic recovery and drive green innovation across the system <p>Given that the NI Assembly declared a climate emergency over a year ago, this issue requires immediate attention in the new mandate, if it is not addressed through climate legislation currently going through the Assembly in the remaining months of the existing mandate.</p>
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Responses received via CitizenSpace

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No	Respondee	Have we prioritised the right projects?	Any objections to our proposed projects	Any other comments
1	Private Individual	No	A project related to expanding the provision of EV charging infrastructure in NI is needed. Initiatives such as the following should be considered; engaging with key stakeholders to review policy blockers to EV charging, reviewing the likes of Connections Charging methodology for EV charging connections, reviewing DUoS charging methodology for EV charging connections etc. This is key as NI currently has blockers that the rest of the UK or ROI do not have when it comes to electricity regulation and policy around EV charging.	N/A
2	Electric Vehicle Association Northern Ireland	Unsure		The FWP should include an action to work with key stakeholders to advance provision and development of the EV charging network in NI. This should include a review of the Connections Charging methodology with regards to EV charging etc.
3	N/a	Unsure	Business plan projects could be more strongly focused on renewables and delivering net-zero. It is clear as an executive there has been a failure to prioritise this but “help deliver net-zero” within planned projects should be separated as its own project covering all utilities who have limited incentive (or penalties) to promote significant work in these areas which could have a long term impact on consumer and business prices.	GD23 price control - this should be heavily scrutinised in light of net zero targets. Should further expansion of a fossil fuel Network be considered or should this investment be in renewable networks and

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				only the maintenance of existing non-renewable energy networks?
4	Firmus energy	Unsure	<p>firmus energy is committed to working with the Utility Regulator (UR), Department for the Economy (DfE), the Consumer Council for Northern Ireland (CCNI) and other stakeholders in order to continue to provide the benefits of natural gas to as many consumers as possible in a socially responsible manner, and to realise the substantial role our infrastructure has in delivering the transition to net zero carbon in Northern Ireland. To this end, we welcome the opportunity to respond to the UR’s consultation on the Forward Work Programme (FWP) 2022-2023.</p> <p>The UR has set out its comprehensive work plan for the next year, reflecting projects which are aligned to its legislative, statutory and regulatory obligations. Whilst we recognise and support the projects set out by the UR, we have taken opportunity to highlight additional projects that must be delivered or progressed within the next 12 months; we believe these projects will require a significant level of support and engagement from the UR and should be recognised within the FWP.</p> <p>New Meter Solution for Gas Networks We note that the ‘New Meter Solution for Gas Networks’ project has not been included within this FWP. firmus energy is an active participant in the established industry Gas Metering Solutions Group (GMSG) and have been working alongside other participants to deliver an appropriate industry solution. To date, the UR has had oversight of the project via the GMSG, however, as the procurement stage of the project concludes, there will be a requirement to review and develop associated industry arrangements to support the successful trial and roll out of the new metering solution. We consider that the support of the UR will be critical to this stage of the project and therefore consider that this project ought to be identified explicitly within the UR’s FWP in 2022 -2023.</p>	<p>firmus energy is supportive of the projects proposed by the UR, however we note that the UR has understandably increased their resources to support progression of these projects. Successful delivery of many of the UR’s projects will be contingent upon the ability of industry to support a successful delivery and will therefore require adequate resourcing from within the participating companies. As previously discussed with the UR, firmus energy’s Regulatory Affairs team consists of two FTEs, who share responsibility for regulatory matters across both our Distribution and Supply businesses. To ensure our industry obligations can be fulfilled, there must be</p>

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			<p>Meter reading responsibilities</p> <p>firmus energy notes that the UR’s FWP does not make any reference to the possible transfer of responsibility for meter reading and inspection from NI gas suppliers to DNOs. As noted in our response to the UR’s 2021 /2022 FWP, firmus energy is supportive of the transfer of responsibility in principle, however, in order to deliver upon such a fundamental change within the industry, we strongly believe that a considerable programme of stakeholder engagement and consultation will be required in order to achieve a successful transition. The review and development of relevant industry arrangements will also be required to support this transition. Again, firmus energy believes that a project of this scale should be reflected within the FWP.</p>	<p>industry-wide engagement and recognition of each company’s ability to provide appropriate resource to support delivery of the UR’s FWP. This should further assist the UR in determining which individual projects set out in the FWP are of highest priority over the next 12 months.</p> <p>firmus energy is fully committed to supporting the recently published Northern Ireland Energy Strategy. We recognise the importance of lowering carbon emissions and achieving net zero carbon by 2050 and we are keen to further engage with the UR in progressing this energy transition.</p> <p>firmus energy looks forward to our continued engagement with the UR, as we support delivery of the UR’s FWP. We very</p>
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				much recognise the importance of assisting the UR to implement their 2022- 2023 strategic objectives, as discussed above, and can assure the UR of our willingness to do so.
5	Southern Health and Social Care Trust	Unsure		No
6	GMO NI		<p>We note that a project specifically related to the gas market included in the 2021-22 workplan, Strategic Objective 1:6: “Commence review of the gas exit capacity arrangements” has not been included in the 2022-23 workplan. Possibly internally within UR there has been some work in this area carried out but so far, no workplan was produced or any update/clear path forward to industry has been provided.</p> <p>More specifically, with regard to the dropping of the short-term exit capacity review project from the upcoming workplan, it is GMO NI’s understanding that this is critical for certain entities within the NI gas market and that it should be included in the workplans moving forward. Indeed, for years this has been on the radar of certain entities and flagged to UR and has more recently become more critical with a suggestion from industry that the current framework of the exit capacity regime may become a significant issue from October 2023.</p> <p>GMO NI has developed a provisional timeline and presented it to UR, which indicates that if delivery for October 2023 is required, the project needs to commence as soon as possible. This is due to the fact the framework needs designed, consulted on and licence changes implemented before the tariff</p>	<p>Where projects have been dropped from the previous year's workplan, explicitly citing these within the document outlining the rationale for dropping them would be a useful inclusion in the interests of transparency.</p> <p>Within the draft forward workplan document it would be useful to provide a review of the status of the projects from the previous year's workplan. This could show an update on each</p>

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			<p>process in advance of the gas year 23/24, which commences in January 2023. There will also be the need to systemise the arrangements. To deliver this is challenging and GMO NI would urge UR to consider inclusion of an exit capacity review in the upcoming workplan and to commence engagement with relevant parties immediately.</p>	<p>of the projects, whether complete or being rolled over into the next period along with an overview of any delays/issues with delivering the projects.</p> <p>For example, from the 2021-22 workplan Strategic Objective 1: Ref 4: “Facilitate innovation in energy markets by reviewing licences” is included in the workplan however it is unclear if this has taken place. It has also dropped off the 2022-23 workplan and so the assumption would be it has either been completed, dropped from the 2022-23 workplan, replaced by some other project or even is to be scheduled for a year beyond the upcoming workplan period. A status update would provide the clarity on this, and if it has been dropped a rationale could also be given.</p>
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				<p>Within the workplan table in the timing column it would be useful to see an anticipated end delivery date of the project. Some projects may be anticipated to run for several years and having this information will mean if a project does roll over into the next year it will be of no surprise as it wasn't expected to be delivered in that specific year.</p> <p>For example, "Strategic Objective 1: Ref 1: Deliver our Consumer Protection Programme (CPP) to schedule" which was in the 2021-22 workplan seems to have been rolled over into the upcoming workplan for 2022-23 (Strategic Objective 1: Ref 1). It may be that this work was always envisaged to run on for a few years however if the anticipated delivery date was originally included in</p>
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				<p>the table then this would have been known. If it has been delayed then the review of the projects process mentioned previously would capture this.</p> <p>On a final note, GMO NI welcomes the inclusion of Ref 2 in the Organisation Projects to “Work with DfE and Stakeholders to review the appropriateness of our vires in light of emerging energy and climate change policy”. This is of key importance to ensure the regulation is fit for purpose as we continue through the energy transition. Within this context too, although projects mention specific sectors, it is apparent that as we move forward into the world of whole energy systems, the projects and ongoing work should reflect this by engaging where</p>
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				appropriate in a cross sectoral manner.
7	ESB			<p>Thank you for the opportunity to share ESB Generation & Trading’s (“ESB GT”) views on the draft Forward Work Programme (“FWP”) 2022–2023.</p> <p>ESB GT appreciates the challenges and opportunities described in the latest FWP and is looking forward to support UR. We are in general agreement with the content of the FWP and that you have prioritised the right projects. However, one of the projects that was listed under Strategic Objective #1 in FWP 2021–22 was “Commence review of gas exit capacity arrangements”. The purpose was to consider how the gas exit capacity arrangements and SEM work effectively together and identify if</p>
		No		

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				<p>any changes are required to continue to protect the interests of customers. Short-term gas exit capacity products provide flexibility that would allow efficient utilisation of the gas network and peaking plants. This would be a supportive measure for more renewable generation in the SEM and ultimately deliver on the energy transition.</p> <p>ESB GT had raised the topic of short-term exit capacity arrangements in UR's March 2021 consultation on Seasonal Multiplier Factors for Gas Transmission. As with most gas Shippers, ESB GT sees the benefits of having gas exit capacity arrangements to improve forecast performance and consequently minimise imbalances. In our response (link below), we highlighted the potentially perverse</p>
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				<p>signals that could arise in SEM. We believe that the importance you originally attributed to this topic, on behalf of customers, remains valid and we ask that it is reinstated for FWP 2022–2023. We recognise the significant workload you have adopted and the management of it is important, but we do not want to lose the value of the work that UR has already undertaken in being ready to have a decision for 2022, as previously planned. The reinstatement of the project on gas exit capacity arrangements will also support UR's low-carbon transition.</p> <p>https://www.uregni.gov.uk/files/uregni/media-files/2021-04-13%20ESB%20GT%20response%20to%20seasonal%20multipliers%20factors%20consultation.pdf</p>
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8	SSE Airtricity	Yes	<p>SSE welcome the UR’s draft forward work plan for 22/23 and the opportunity to respond. Firstly, we would like to begin by noting that we agree that what has been included in the Forward Work Plan, although we note that the level of what may be achievable will be dictated by resources. As the UR will be aware, industry is also resource constrained at times. Taking this into consideration, we urge the UR to carefully prioritise the key deliverable projects set out in this plan and note that any suggestions taken in our response have taken workload and resourcing into account and are not taken lightly.</p> <p>We appreciate the prioritisation of the UR’s work on the Consumer Protection Programme. We are conscious of the circumstances that are present in the energy industry at the minute and that vulnerable customers are likely to suffer the most as a result. We understand the drivers of the project and await the publication of the Best Practice Framework on Vulnerability. As the UR will be aware, we have worked extensively with customers over the past year in the realm of affordability and vulnerability and are keen to share experiences with the UR in due course through that consultation process.</p> <p>Another project we welcome and believe to be of significance in the coming years is the review of gas regulatory framework to facilitate possible biomethane injection. The work surrounding biomethane injection so far has largely been focused on a T&D level. Given that the industry has thus far been dealing with this operationally in a regulatory vacuum, SSE welcome regulatory guidance from the UR and we welcome future engagement in this process.</p> <p>We think the industry would benefit from the UR’s endorsement in the work that is ongoing in identifying a better gas metering system through a dedicated and focused reference in the FWP. We are of the view that there will be regulatory deliverables to enable this programme which is integral to ensuring the successful delivery. For example, we would expect to see</p>	<p>We feel that the majority of projects the UR have prioritised are appropriate given the resourcing and involvement that will be required. One project however that we think may pose challenges to progress at this time is the implementation of Guaranteed Standards of Service for electricity. While we understand the intent, the resourcing this project would require is beyond what would be manageable when we consider the resourcing of other more urgent projects. As the UR is aware there are significant constraints on the labour market at present, given unique macroeconomic conditions that are at play. The additional regulatory requirements involved would be burdensome to both suppliers and customers given the current</p>
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			<p>reference to ensuring that the funding is in place, along with a commitment to dedicated governance arrangements on the delivery working in conjunction with the DNOs and the commissioning gas suppliers.</p>	<p>circumstances. For those reasons, we believe that as the delivery of the Best Practice Framework on Vulnerability will in itself be an enormous endeavour, this workstream on GSS as well could operationally pose a challenge as it would constitute another large change in the retail market.</p> <p>We fully support the work proposed around the domestic consumer experience of debt but think the work undertaken could be more useful with some additional steps. With the unprecedented levels of debt that will be experienced throughout the energy industry this year, this is a pertinent area of focus and we support that the UR have included it on the FWP. We support the work that has been done so far such as CCNI’s fuel bank, and</p>
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				<p>the means tested fund that we have seen been made available through Job Seekers Allowance.</p> <p>What we feel would make this work more beneficial for both suppliers and consumers however, would be a concerted effort by the UR to make research available to suppliers throughout the process. If suppliers have access to consumer research, products and services can be tailored to fit the changing needs of customers in these volatile circumstances. If the research carried out surrounds how we best help customers, it will be more effective if shared with suppliers as soon as possible and conducive to delivering an effective service to consumers, through a clearer understanding of needs and how they should be delivered.</p>
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