



Utility Regulator Draft Forward Work Programme 2025-2026

**Response by the Consumer Council for Northern Ireland
12 February 2025**

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1. Overview of our response

The Consumer Council for Northern Ireland welcomes the opportunity to respond to the Draft Forward Work Programme from the Utility Regulator (UR).

The 2025/2026 Forward Work Programme covers the second year of the UR's five year Corporate Strategy 2024-2029. We welcome the proposed projects which will contribute to protecting and empowering consumers in Northern Ireland, as we transition to net zero.

As Northern Ireland's consumer representative body, we share a lot of common ground with UR through extensive statutory powers in consumer matters, energy, and water and sewerage. We have noted in this response the significant areas of overlap between the UR's welcome and ambitious plans, and our own activities underpinned by our statutory powers relating to energy and water consumers.

Given the convergence in the objectives of our two organisations, we would appreciate early and ongoing engagement throughout the year to ensure we are working effectively to protect and promote the consumer interest, avoid duplication of delivering similar projects and provide value for money.

We already work collaboratively with the UR both strategically and operationally, and we look forward to continuing this partnership working to achieve the best consumer outcomes as we deliver the transition to net zero.

2. About the Consumer Council

The Consumer Council is the statutory consumer representative body for Northern Ireland, responsible for protecting, empowering consumers and representing consumers, 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 (CCA)
- 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 assist 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.
- Publish statistical information about certain complaints about authorised electricity and gas suppliers.
- Publish advice and information about consumer matters to promotes 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) 2018, we deal with disputes of standards of performance between gas suppliers and customers in individual cases.

Our role in water and sewerage

Alongside our statutory obligations under The Order, the Water and Sewerage Services (Northern Ireland) Order 2006⁹ confers certain functions on the Consumer Council regarding:

- The interests of consumers in relation to the supply of water to premises by water undertakers.
- The provision of sewerage services by sewerage undertakers.
- 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 Water and Sewerage Services (Northern Ireland) Order 2006 and NI Water’s Operating Licence legislates for the Consumer Council’s to:

- investigate complaints on behalf of domestic and business users
- give advice on both consumer and business interests
- gather and publish information, including research
- be consulted with on any matter relating to consumer affairs.

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

⁹ [Water and Sewerage Services \(Northern Ireland\) Order 2006](#), UK Parliament

3. Our approach

In this section, we have set out our approach to the Draft Forward Work Programme 2025-2026 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 population¹⁰ but we have more than double the proportion of citizens living in rural areas (36%)¹¹ compared to England (17.1%)¹² and Scotland (17%)¹³.

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%)¹⁴. 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 consumer 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 August/September 2024¹⁵ found:

- 43% felt that their household was worse off when compared to 12 months ago and only about a third (32%) believed their household would be better off in 12 months' time.

¹⁰ [Population for the UK, England, Wales, Scotland, and Northern Ireland: Mid-2023](#), October 2024, Office of National Statistics

¹¹ [NI: IN PROFILE Key statistics on Northern Ireland](#), November 2022, Northern Ireland Statistics and Research Agency

¹² [Rural population and migration](#), October 2021, Department for Environment, Food and Rural Affairs

¹³ [Rural Scotland Key Facts 2021](#), February 2021, Scottish Government

¹⁴ [Key Rural Issues: Northern Ireland](#), 2023, Department of Agriculture, Environment and Rural Affairs

¹⁵ [Consumer Pulse Survey](#), August/September 2024, Consumer Council.

- Almost three quarters (74%) agreed they could keep up with bills and buying essentials, but 18% 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.
- 43% agreed dealing with financial matters was a burden and nearly two in five (38%) agreed their mental health was negatively affected by their financial situation.
- Three in five (62%) 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 Tracker¹⁶ found half of our households had less than £100 per week after paying taxes and essential spending.

Between April and June 2024, our lowest earning households:

- Had a total household income per week before tax of just over £283, which is 6% lower than the UK average.
- Had just under £50 per week after paying taxes and paying for essentials, which is 22% lower than the peak of Q1 2021, of just over £64.
- Spent half (50%) 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 61% for lowest earning households in the UK.

We have lower financial resilience

Northern Ireland has lower financial capability and our citizens are twice as likely to use cash to pay for things¹⁷. We also have the highest rate of economic inactivity at 26.3%¹⁸ compared to 21.8% in the UK¹⁹, and double the Disability and Carer's Benefit claimants²⁰ at c22.1%, compared to GB at c11.1%²¹.

Illegal lending remains an issue that is particularly prevalent in Northern Ireland, although it is accepted that the problem is significantly underreported. Our recent study into consumers' views and behaviours in response to the rising cost of basics²² found 3% of respondents reported using illegal lenders.

¹⁶ [Northern Ireland Household Expenditure Tracker Q2 2024](#), Consumer Council, 2024.

¹⁷ [Financial Lives 2022](#), Financial Conduct Authority, 2023.

¹⁸ [Economic Inactivity](#), Ulster University, 2024.

¹⁹ [UK Labour Market Overview: October 2024](#), Office of National Statistics, 2024.

²⁰ [Northern Ireland Benefits Statistics Summary](#), Northern Ireland Statistics and Research Agency, 2024.

²¹ [DWP benefits statistics: November 2024](#), Department for Work & Pensions, 2024.

²² [Consumers' views and behaviours in response to the rising cost of basics](#), Consumer Council, 2024.

Northern Ireland's largest debt advice charity, Advice NI, reported their debt service was dealing with increasingly higher levels of illegal lending, with nearly £40,000 of debt dealt with during 2022-2023, averaging approximately £3,600 per debt. This was an increase of 61% from 2021-2022²³.

We have a unique energy market

Northern Ireland has a unique energy mix to the rest of the UK. Most households here (62.5%)²⁴ use heating oil as their primary source of energy to heat their homes, rising to 82% in rural areas²⁵. Alongside this, approximately 51% of gas and electricity customers in Northern Ireland are on prepayment meters²⁶, compared to approximately 14% overall in the UK²⁷.

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.

We are a micro business economy

Northern Ireland is a micro business economy with the registered business population accounting for just under 3%²⁸ of the total UK figure (2.7 million in 2023)²⁹.

There are:

- 80,045 businesses registered for VAT and/or PAYE
- 89% or 71,425 are micro-businesses with less than 10 employees
- Just over 2% (1,725) of our businesses are medium or large businesses
- Four in ten businesses (40% or 32,060) with a turnover of less than £100,000
- Just over one in ten (13% or 10,095) with a turnover in excess of £1 million.

Many micro and small businesses act like consumers. They share similar experiences, problems and concerns and can operate at similar levels of market engagement and understanding, and redress.

²³ [Living in a Post-Pandemic World](#), Advice NI, 2023.

²⁴ [NISRA Census 2021 health & housing statistics](#), Northern Ireland Statistics and Research Agency, 2022.

²⁵ [The cost of living crisis in Scotland, Wales and Northern Ireland](#), Centre for Progressive Policy, 2023.

²⁶ [Quarterly Retail Energy Market Monitoring Report for Q3 2024](#), Utility Regulator, 2024.

²⁷ Calculated based on the estimated number of pre-payment customers ([Ofgem launches national evidence-call on prepayment meters](#), March 2023) as a percentage of the total estimated number of UK households ([Families and households in the UK: 2023](#), May 2024, Office of National Statistics).

²⁸ [Northern Ireland Business: Activity, Size Location and Ownership](#), Northern Ireland Statistics and research Agency, 2024.

²⁹ [UK Business: activity, size and location](#), Office for National Statistics, 2024.

4. Our response to individual questions

In this section, we have set out our response to the Draft Forward Work Programme 2025-2026 from the Utility Regulator (UR).

4.1 Overarching issues

The last two to three years has seen considerable market volatility, energy price rises and security of supply concerns, coupled with unprecedented cost of living increases. Forecasts do not show these stresses reducing significantly with many pressures on consumers remaining acute. Households are spending more, and many are struggling to pay for their energy costs.

Consumer Council research, the Consumer Pulse Survey³⁰ and the Household Expenditure Tracker³¹ shows that:

- the discretionary income of our lowest earning households is just less than £50 per week, with 50% of this income spent on food, rent, utilities and transport; and our average weekly discretionary household income is 54% lower than the UK average.
- 94% of consumers were concerned about home energy prices, with 43% stating that they were very concerned, this was similar to June 2024 (42%).
- 38% of households are having to reduce their energy consumption to improve their financial situation.

The Path to Net Zero Energy Strategy sets out the ambitions of the NI Executive to decarbonise the energy system here. This will require significant action and behavioural change from consumers, and it is important for the Consumer Council as the statutory consumer representative body for Northern Ireland, undertakes independent research to understand consumer sentiment and attitudes to this.

4.2 The Consumer Council response to Consultation questions

The Consumer Council is supportive of the projects outlined in the Draft Forward Work Programme. This programme is the first year of the UR Draft Corporate Strategy 2024-2029, which outlines four key objectives:

- Supporting the just transition to net zero
- Securing our water and energy supply
- Enabling best in class energy and water companies
- Providing the highest level of consumer service and protection.

³⁰ [Consumer Pulse Survey](#), Consumer Council August/September 2024.

³¹ [Northern Ireland Household Expenditure Tracker Q2 2024](#), Consumer Council, November 2024.

This Draft Forward Work Programme follows these four objectives, and we have responded to each in turn.

Strategic objective 1: Supporting the just transition to net zero

The Consumer Council conduct an extensive range of consumer research, education and empowerment as required under our statutory obligations, “Provision of information to consumers” and “acquisition and review of information”, contained within the Energy Order (Northern Ireland) 2003 [the Energy Order], and the Water and Sewerage Services (Northern Ireland) Order 2006 [the Water Order].

In discharging our obligations over the past three years we have undertaken significant projects to understand consumer attitudes to the energy transition, educating consumers regarding energy efficiency and a joint project with the Utility Regulator to ascertain consumer protection requirements during the energy transition. This includes 'Consumer attitudes to protection during energy decarbonisation in Northern Ireland' published in 2023³².

Our work in this space provides great opportunity for further collaboration with the Utility Regulator to support consumers' transition to net zero in a just and fair manner.

To achieve net zero that is both affordable and ensures security of supply, it will necessitate new policy development and enhanced regulatory provisions. We welcome that the UR are to develop the regulatory frameworks that will be needed to support the implementation of DfE's smart meter project.

Consumer Council research, including 'Consumer Attitudes to Protection During Energy Decarbonisation Northern Ireland'³³ and 'Attitudes to the Energy Transition'³⁴, shows that consumers have general awareness of climate change, but they are unsure of what they should be doing to help. They need education, support and good leadership. The planned roll-out of electricity smart meters is a project where all of these factors should be taken into account.

Consumers' levels of trust can vary, but they are apprehensive with giving over control to external organisations. If handled correctly, the roll-out of smart meters could provide an opportunity to build both consumer trust and confidence and to empower consumers to better understand and reduce their energy usage.

The opposite is also true, and if mishandled, it could further erode consumer trust which will be a significant barrier to decarbonisation.

In the recent Smart Electricity Meters in Northern Ireland Consultation³⁵, DfE proposed that the Consumer Council should, “lead a sub-group and co-ordinate a plan to meet with needs of consumers from early engagement to full deployment” for the consumer protection and communication workstream on the smart electricity meters project.

³² [Consumer attitudes to protection during energy decarbonisation in Northern Ireland](#), Consumer Council, 2023.

³³ [Consumer Attitudes to Protection During Energy Decarbonisation Northern Ireland](#), Consumer Council, 2024.

³⁴ [Attitudes to the Energy Transition](#), Consumer Council, 2024,

³⁵ [Consultation on the Design Plan for the rollout of Smart Electricity Meters in Northern Ireland](#), DfE, 2024.

Therefore, the Consumer Council would encourage early and regular engagement with the UR to ensure that consumers are prioritised and protected throughout the smart meter rollout.

We support the UR's proposed engagement with NIE Networks and suppliers over time of use (TOU) tariffs and dynamic tariffs to ensure cost-reflectivity. We stress the importance of considering the impact on each customer class to minimise the risk of excluding disadvantaged or less-technology-savvy consumers from their use.

We also welcome that the UR will start the process to develop a regulatory framework for biomethane injection into the transmission system and assist DfE with the development of its biomethane policy.

Biomethane could have an important role to play in the journey to help decarbonise the Northern Ireland energy sector. However, we would like early discussions with the UR to make sure that provisions are included to ensure vulnerable consumers and those at risk of fuel poverty are protected. This is particularly important if the costs of biomethane production are socialised across all natural gas users as per the proposals in the DfE biomethane call for evidence³⁶.

We recognise the need for the UR to undertake preparatory work for the potential future firm access review for large, renewable generators, and understand that the bulk of the work would be undertaken in subsequent years. We highlight the need for customer impact assessment as critical to understand the potential cost changes and whether, combined with other potential pricing changes, certain consumer groups could be adversely disadvantaged.

Strategic objective 2: Securing our energy and water supply

We are supportive of the various projects outlined within this objective and recognise there is a balance that must be struck to maintain and improve our energy assets for future generations, while acknowledging and addressing present day affordability requirements.

Our research on the impact of the energy crisis on affordability and the impact of energy transition on consumers³⁷ revealed that a significant number of consumers surveyed had to reduce their use of energy by turning off radiators to save energy, heat their homes for fewer hours than they needed, and wear extra layers of clothing. Almost one in five say they have had to prioritise eating instead of heating.

How the energy and water networks operate directly impact on consumer bills, and it is important that frameworks, market mechanisms, price controls, and infrastructure projects are delivered in a way that is cost-effective, fair and transparent.

We anticipate that the UR will consider overlaps and interactions between the various projects under this objective, so that the most cost-effective, timely solutions are adopted, consistent with supporting the energy transition.

³⁶ [Call for evidence Developing Biomethane Production in Northern Ireland](#), DfE, 2024.

³⁷ [The impact of the energy crisis on affordability and the impact of energy transition on consumers](#), Consumer Council, 2023.

It is also important that the UR continually modifies and develops their regulatory tools that ensure affordable, security of energy supply across electricity and gas industries and ensures protection for all consumers, particularly our vulnerable consumers.

Strategic objective 3: Enabling best in class energy and water companies

The Consumer Council supports the objective of enabling best in class utility companies in Northern Ireland. This objective must embrace and balance the need for economic efficiency with high standards of customer service and long term sustainability of infrastructure.

As outlined in the previous section, decisions must be cost-effective, fair and transparent. They must place consumers' needs at their heart and drive improved service standards.

The scale of the increase in cost that was necessary to deliver RP7 reflects the step change that was required in network capacity and operation to facilitate innovation and support the delivery of net zero.

PC28 will also require a step change in investment to allow NI Water to compare to the best water companies in the UK. We look forward to continuing to work with UR on the delivery of PC21 and the development of a consumer focused PC28.

The Consumer Council would also welcome early engagement with the UR on future network gas price controls GT27 and GD29 and future gas retail price controls SPC27.

The scale of investment required for all the aforementioned price controls, underlines the necessity to ensure costs are appropriately scrutinised, service standards raised. We look forward to working with the UR on these price control reviews to help ensure that consumers are front and centre of decision making, and they are appropriately protected, especially our vulnerable consumers.

We will continue to support the Utility Regulator in deepening the scrutiny it applies to companies' investment plans via these processes. We also encourage the Utility Regulator to ensure that any enhancement in investment is coupled with a greater focus on quality of service.

Strategic objective 4: Providing the highest level of consumer service and protection

Given the additional consumer need and detriment that has become apparent during the high energy prices that we have experienced over the last few years, we are mindful of the importance of ensuring our general powers "to promote and safeguard the interests of consumers in Northern Ireland" (General Consumer Council (Northern Ireland) Order 1984), and specific complaints powers contained within the Energy Order and Water Order are used to complement the deeper powers of the UR in the protection of utilities' consumers.

We welcome many of the numerous projects outlined within this objective and are particularly supportive of the Consumer Protection Programme 2024-2029 (CPP) as the UR embarks on the second year of the five-year programme in improving best practice and consumer protection standards.

However, there is limited information on the specific projects that would be delivered as part of year two of the CPP. We would encourage the UR to continue in its openness when developing individual projects.

In reiterating our support for the enforcement work of the Utility Regulator we note the overlap between the Utility Regulator's functions and the Consumer Council's statutory roles to understand consumers, address consumer complaints and consider thematic issues impacting consumers. It is essential that the two organisations collaborate to deliver on behalf of consumers and to avoid duplication of service provision.

As outlined in our response to the five-year CPP, we conduct an extensive range of consumer research each year as required under our statutory obligation of "acquisition and review of information" regarding consumers contained within the Energy Order, and the Water Order. We welcome the opportunity to work closely with the UR to develop complementary projects and research that add value to the evidence base.

5. Conclusion

This Draft Forward Work Programme sets a solid plan in place to protect consumers as we journey towards net zero.

There is significant overlap in the obligations, activities, and ambitions of the UR and the Consumer Council regarding energy consumers, so regular discussions between our two organisations at both strategic and operational levels are essential to maximise cooperation and avoid duplication of service provision and provide value for money. We would like to reaffirm our commitment to this collaboration.

This partnership approach alongside shared engagement with other key stakeholders ensures that both organisations collectively focus on achieving a just transition that is fair and works in the best interests of Northern Ireland consumers.

6. 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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