

Responses Provided via Citizen Space

16	<p><u>Wind Farmer</u> It's time the agriculture sector who operate in the generation of electricity by renewables had a voice and got listened to about issues they have</p> <p>Yes as a wind turbine owner and recent times I haven't seen much transparency from the UR they held us dangling on a string for months in matter of fact over a year they wrote to a licensed supplier expressing their disappointment in their actions but done nothing The UR have no transparency as when asked to supply evidence to back up anything they claimed to protect a licenced supplier surely they UR need to be more open and not cover up Even getting grid connection was a get rich quick scheme for NIE networks when questioned about how they arrived at the price they quoted they said these are between the UR guidelines when asked why mine was not at the lower end they couldn't answer basically if you want a connection pay the price they then had a hard wire telecommunication link priced in at 10k when questioned about this they need agree to send someone out to check GSM signal then agreed a SIM card would work ok at my site but didn't know how much this would cost but would definitely be paying me back money to date no refund given So even from the start we have been getting ripped off and still are to this very day (now rogue suppliers) can you explain why we only get paid peanuts for electricity generated compared to the suppliers who charge 50p per unit to businesses to buy in we don't come anywhere near half this (a quarter) Proof that these companies get away with doing what the like as they know the UR won't do anything on them as they have been allowed to become rich quick schemes for suppliers and no penalties from the UR in matter of fact from my side of the fence I would actually like to know what checks are carried out by the UR for I can't find any evidence of it</p>
17	<p><u>UFU</u> Utility Regulator Consultation on Draft Forward Work Programme 2025/2026 (February 2025)</p> <p>The Ulster Farmers Union (UFU) is the largest farmer/land-owner representative organisation in Northern Ireland with over 12,000 members and we welcome the opportunity to contribute to the Northern Ireland Utility Consultation on the Draft Forward Work Programme 2025/26.</p> <p>Climate change is a huge environmental challenge and one that the agricultural sector cannot ignore. Northern Ireland agriculture is subject to the legal framework provided by 2022 Climate Change Act will imposes legally binding targets which will be a major challenge to the viability of the Northern Ireland agriculture.</p> <p>The UFU message is clear, we can be part of the solution. The Northern Ireland agriculture sector is continuing to deliver reductions in greenhouse gases (GHGs) alongside other sections of society and renewable energy generation/biogas production can play a crucial role in reducing emissions. By doing so, this will decouple agriculture output from the environmental constraint of greenhouse gas emissions, and improve the overall position of our industry in regard to climate change.</p> <p>We wish to focus on the section 'Consumer Protection Programme (CPP) for 2024-2029'. The CPP identifies 'the farming sector experiences in energy and water' and goes on to set out a commitment to 'develop our understanding of the farming sector's engagement with regulated utilities'.</p>

- Scoping and conduct of research to understand the experience of Northern Ireland farmers with gas, electricity and water in Northern Ireland (Quarter 3).
- Publish research report and consider recommendations for improved (Quarter 4)

The UFU wish to acknowledge and note our appreciation that the Utility Regulator for their commitment to developing their understanding our sector's engagement with regulated utilities.

However, our engagement is multi-faceted and not straight forward.

In terms of engagement with regulated utilities, Northern Ireland agriculture interact with these entities in terms of their use of energy, heat and water both as consumers (both in a domestic and non-domestic capability) and also in their position as renewable generators.

We will address energy, heat and water below;

Energy

Northern Ireland landowners play a three-part role in energy; landowner, local demand customer and renewable generation.

1. Landowner - The electricity infrastructure covers thousands of kilometres of cables, poles and transformers crossing our members land.
2. Local Demand Customers - Farm businesses are direct customers, consume large and significant volumes of electricity. Electricity is a key input to the day-to-day running and management of Northern Ireland farms
3. Renewable Energy Generators/Prosumers – UFU members are at the forefront of distributed generation, with electricity being produced by buildings with solar panels on the roofs, through wind turbines on their land, via AD plants on their farms and through other forms of on-farm renewable energy. The UFU membership are therefore text book definition of 'prosumers'.

Heat

Heat is needed in livestock production (mainly poultry and pigs), drying arable crops such as grain and the heating of greenhouses and polytunnels. This is provided by a range of heat sources; including LPG, kerosene and to a lesser extent natural gas.

Stored in LPG bulk tanks, farm propane is ideal for farming in remote locations. Both cleaner and greener than other fuel options, it is perfect for farming needs. It's many benefits include: lower carbon emissions; economical; reliable; minimal maintenance; versatile and secure

As in Great Britain, the LPG market in Northern Ireland is not regulated in the same manner as the much larger natural gas market. But the UFU would like to learn more about how it is regulated in Northern Ireland, especially since the sector has an aim to fully transition to BioLPG by 2040.

In terms of renewable generation, biogas is a product of the AD process and therefore, many of members have a role to play in its production, generation and distribution. Biomethane and the potential for its injection onto the gas grid is the most visible example, to which we have been involved. Although there are other uses for Biomethane and these should be considered.

Water

Water is a critical aspect of food production, essential in keeping livestock hydrated, helping to ensure crops thrive through their growth stages and to stimulate grass growth. In the UK, a significant amount of water is used in agriculture. It is estimated that around 8-10% of water use in the UK is for home and business use, with the remainder being used in agriculture.

As with energy and heat, our members have adopted renewable technology, this time utilising hydro power in energy generation.

Renewables

Over the last 20 years many of our members have committed to small-scale renewable energy generation; Wind Power (mostly single turbines up to 250kW), Anaerobic Digestion (along with biogas production), Solar Thermal/PV and biomass (both feedstock production and generation), complementing existing/conventional farming practices.

The Northern Ireland land-based sector is now producing enough renewable power to energise up to 150,000 homes. However, our sector has experienced significant barriers in their adoption and integration of renewables into their businesses;

- Lack of available grid capacity
- Astronomic grid connection quotes/costs
- Planning Policy
- Government Policy failures

Despite this there are currently 798 wind turbines in Northern Ireland with a total installed capacity of 214MW. According to Renewable NI, 5MW of wind power can power 5,000 homes. So, if you combine this all together, the land-based sector in Northern Ireland is producing enough wind to power all the households in Belfast.

As stated above, there are other forms of renewable generation and if you bring all these into the mix, Northern Ireland agriculture has the potential to contribute to energy transition/decarbonisation. But this potential cannot be unrealised unless we have a support framework for small scale renewables.

Specifically in relation to the lack of grid capacity we would like to make the following point.

In November 2023, NIE Networks, for one day only, invited applications for G99 generation, with very limited capacity available. 15 months later, many would-be applicants informed that they can have their applicant fee refunded or progressed as a zero export application, until technical specifications have

been agreed and signed off by NIE Networks and SONI.

Yet in the Limavady area, there are plans afoot to site solar farms and the questions have been asked by our members as to how they are able to connect to the grid.

The UFU is led to believe that these companies are funding the construction of their own sub stations costing £2-£3 million. The feeling amongst our members is that this is created an uneven playing field and the comment has been made that money talks, yet potential small-scale renewable generators are unable to connect and realise the opportunity to produce low carbon energy/heat.

Immediately following section v. the consultation sets out section vi. 'Improving the nondomestic consumer experience'. The UFU would urge that the UR merges this into v. and looks to ways in which you can improve the non-domestic consumer experience (including agriculture) to remedy gaps identified in the existing non-domestic regulatory framework.

By looking to publish decision paper on the consultation on improving the nondomestic consumer experience and consulting on new and/or amended licence conditions, the farming sector should not be overlooked, both in terms of conventional non-domestic customers but also in terms of renewables.

Our members have experienced energy hardship first hand. Take for example the average Northern Ireland dairy herd.

The typical dairy cow uses one unit (kWh) of electricity each day, 365 kWh per year. Over 80% of total energy use on a dairy farm is accounted for by milk cooling, water heating and vacuum pumping. Highest electricity demand is for cooling milk (38 per cent), closely followed by water heating (31%). The vacuum pump uses 20 % and the remainder goes on lighting and other smaller items.

From 2021 to 2022, the average Northern Ireland dairy farm saw energy costs increase from £40 to £160 per cow.

Looking forward, the UFU as the principle farming representative organisation in Northern Ireland would ask that we are included in the consultation period when preparing the research report and subsequent consideration in drawing up recommendations for improved protections

We would like to make one final point and it relates to an Energy Dashboard for Northern Ireland. The concept of an energy dashboard for Northern Ireland has long been advocated by the UFU and has been highlighted in many of the consultations and calls for evidence to which we have responded. Furthermore, it has been discussed at the Renewable Grid Liaison Group (RGLG).

The proposed dashboard would feature; Generation and grid projects in planning; Build timescales and would allow the tracking of growth of demand due to electrification of heat and transport.

UFU would stress that for this to be a success, it must be a collaborative effort between the Utility Regulator (who may have to make the necessary regulatory approval) and government departments, licensed companies and stakeholders including UFU.

18 **Firmus energy distribution**

firmus energy networks do not have any objections to the projects identified in the FWP. We are fully committed to working with the Utility Regulator, the

Department for the Economy (DfE), and the Consumer Council for Northern Ireland (CCNI) to ensure that the interests of consumers remain the top priority in all our collective efforts. We believe that collaboration between all stakeholders is essential to achieving our common goals, particularly in the drive towards net zero, a goal that is shared by all the aforementioned parties. The gas distribution network can play a central role in the successful transition to net zero, and it is vital that all stakeholders recognise its importance as we work together to deliver a more sustainable and resilient energy system for Northern Ireland.

Smart Meter (SM) rollout

firmus energy networks acknowledges the inclusion of the Smart Meter (SM) rollout as a significant project that requires prioritisation by the Utility Regulator. We fully support the Utility Regulator's attention to this important initiative. However, as noted in previous sections of this response, we ask that the same level of focus and prioritisation be given to the Future Gas Pay as You Go (PAYG) Programme, which will have a significant impact on consumers, DNOs, and gas suppliers across Northern Ireland. Given the appointment of an electricity-focused Smart Meter manager and plans to establish a Smart Meter team, we believe it is critical for the Utility Regulator to ensure the Future Gas PAYG Programme receives similar levels of engagement and consideration, as it will require a substantial budget and extensive planning to implement effectively. This initiative is pivotal to ensuring that all consumers, particularly those on prepayment meters, have access to equitable and efficient gas services, and its complexity and significant bearing on Price Control allowances warrants dedicated regulatory attention.

Biomethane regulatory framework

firmus energy networks appreciate the ongoing efforts and commitment of the Utility Regulator in facilitating the delivery of renewable gas and welcomes the continued inclusion of Biomethane Regulatory Framework projects in the Utility Regulator's FWP. As a key stakeholder in the delivery of gas network services, we recognise the importance of developing a clear and robust regulatory framework for the injection of biomethane into Northern Ireland's gas transmission system. This framework will be vital in supporting the transition to a low-carbon energy future and enabling the effective integration of renewable gases.

As a Gas Network Operator (GNO), firmus energy networks is committed to contributing to the development of this regulatory framework. We fully support the objectives of the project, which aim to provide clarity to potential biomethane developers and ensure a smooth integration of biomethane into the transmission network. The proposed milestones, particularly those concerning collaboration with GNOs and assisting the DfE with the development of its biomethane policy, align with our priorities and the long-term vision for a sustainable gas network. We are prepared to work closely with other GNOs to help shape a cohesive framework that ensures the safe, reliable, and cost-effective injection of biomethane into the transmission system.

We would like to emphasise the importance of the delivery of DfE's biomethane policy to foster growth of the biomethane sector. Noting the key milestones set for Quarter 4, firmus energy networks welcomes any opportunity to assist the Utility Regulator and DfE as needed in informing the policy. We would urge that the Utility Regulator and DfE utilises not only the DfE Call for Evidence but also considers the Energy Strategy Funding project on Network Constraints to review methodology for cost allocation. Additionally, we note that DfE has recently launched a Consultation on the Increased Socialisation of Connection Costs in the Electricity Distribution Network, and we would call for similar engagement with stakeholders regarding the socialisation of biomethane costs, such as connection and injection costs. This engagement is critical to ensure that these costs are fairly allocated across the sector and that the integration of biomethane is both sustainable and affordable.

Given that the development of biomethane injection in Northern Ireland has progressed without a formal policy framework, we urge that this project remain a high priority for the 2025/2026 period. The development of a clear regulatory framework for biomethane injection is crucial to providing much-needed clarity for biomethane producers and energy consumers who seek to access locally produced renewable energy.

Northern Ireland energy system model

firmus energy networks welcomes the inclusion of the Northern Ireland Energy System Model project in the Forward Work Programme. We recognise the potential value of this initiative in enhancing the Utility Regulator's modelling capabilities, which will be important in supporting Northern Ireland's energy transition. The development of a "Whole System" model has the potential to provide critical insights for guiding effective policy, investment decisions, and the overall optimisation of the energy system.

We fully support the objectives of this project, particularly the assessment of the desirability and feasibility of creating a "Whole System" model for Northern Ireland. We appreciate the focus in Phase One (Quarter 2) on evaluating the feasibility of this model, which should identify the key benefits and potential challenges, such as data gaps, technical limitations, and regulatory issues. It is essential that this phase examines not only the benefits but also the barriers that could hinder the model's effectiveness.

Given the complexity of the energy system and the interdependencies between different sectors, we emphasise how essential it is for the Utility Regulator and DfE to ensure that the feasibility study includes input from a broad range of stakeholders, including gas DNOs. Integrating the gas sector into this assessment will help to ensure the model reflects a comprehensive, system-wide perspective and addresses key challenges such as decarbonisation, resource allocation, and system optimisation.

Should the feasibility study confirm the viability of the "Whole System" model, we are willing to collaborate on the Phase Two development process. This phase will require extensive collaboration among stakeholders to ensure that the model is accurate, reliable, and useful for decision-making. It is critical that gas DNOs are closely involved in this phase, not only to ensure the model aligns with the needs of the gas sector but also to inform future Price Control submissions and evaluate the potential impacts of the model on gas distribution networks.

Strategic objective 2: Securing our energy and water supply

Security of supply regulatory tools

firmus energy networks support the objectives of the Security of Supply Regulatory Tools project outlined in the UR's Forward Work Programme. As a key stakeholder in the gas network, we recognise the importance of monitoring and ensuring the adequacy of the electricity and gas transmission systems to maintain a secure and reliable energy supply. We are committed to engaging actively in the development and modification of regulatory tools relating to fuel security. We encourage Utility Regulator engagement with key stakeholders on any modifications required to industry rules, ensuring that these changes are effectively integrated across both the electricity and gas sectors to enhance overall energy system resilience.

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

Regulatory approach to Future Network Gas Price Controls (GT27 and GD29)

firmus energy networks welcomes the continued engagement from the Utility Regulator regarding the Regulatory Approach to Future Gas Network Price Controls (GD29). We value the collaborative approach taken to date, particularly the Price Control one-to-one discussions with gas DNOs and the formation of the Price Control Working Group, which has already proven invaluable. These initiatives have facilitated the sharing of insights, addressing of concerns, and alignment on key issues that need to be addressed in GD29.

We welcome further engagement this year, particularly regarding Revenue Recovery timing and GD29 Tax treatment. Revenue Recovery timing is of particular importance for the Future Gas PAYG Programme, given the significant costs associated with it. It is essential that the Utility Regulator carefully considers how these substantial costs will flow through to allowances and the impact this will have on the rollout of the programme. The successful implementation of the Future Gas PAYG Programme is dependent on this, as its costs are material and need to be properly reflected in the allowances to ensure the programme can proceed effectively.

As we look ahead to GD29, we appreciate the Utility Regulator's commitment to early and robust scoping and planning for the future gas network Price Control regulation. The ongoing dialogue and discussions through the Price Control Working Group are critical for flagging early considerations and identifying priority issues that will need to be addressed. The insights gained from GD23, particularly regarding Revenue Recovery timing, and further development of the priorities for GD29, will be essential in shaping the framework for the next Price Control.

We fully support the Utility Regulator's focus on structuring the gas network Price Controls to promote long-term sustainability, investment, and innovation while ensuring affordability and fairness for consumers. We look forward to contributing to the upcoming Price Control consultations and the publication of the Utility Regulator's initial findings, decisions, and next steps in Quarter 4, which will be pivotal in guiding our preparations for the next Price Control period. We remain committed to working closely with the Utility Regulator and other stakeholders to ensure that the future Price Control framework supports the energy transition and the evolving role of gas networks in Northern Ireland's energy system. We are eager to continue our engagement and contribute to this important workstream as the regulatory framework for GD29 takes shape.

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

Consumer Protection Programme (CPP) for 2024-2029

Supporting the Just Transition to Net Zero: Understanding consumer expectations around Just Transition

It is crucial to continue to gain insight into how consumers view the energy transition and the factors that will influence their engagement and support for this process. firmus energy networks recognises the importance of understanding consumer expectations to ensure that the energy transition is not only effective but also fair and inclusive. This insight is also essential for aligning the Utility Regulator's statutory objective to promote the development and maintenance of an economic and coordinated natural gas industry with the broader Just Transition goals.

We believe that any benchmarking exercise comparing Just Transition approaches in other jurisdictions must take into account the specific context of Northern Ireland. While comparisons can provide valuable insights, it is essential to consider the unique opportunities and challenges faced locally. In particular, Northern Ireland's strong agricultural sector, the potential for renewable energy development, heavy reliance on home heating oil and the widespread issue of fuel poverty are all factors that must be carefully evaluated when designing policies for a Just Transition. The Utility Regulator has a statutory duty to ensure the gas industry remains economically viable, and this must be reconciled with the Just Transition objective of making the energy shift fair and accessible for all consumers.

We welcome deliberative research on consumer understanding of the Just Transition. Gaining a clear understanding of how consumers perceive the transition, and the key drivers of their behaviour will be essential for securing public support. While cost is likely to be a primary concern for many consumers, we believe that the goal should be to explore other factors that could encourage broader engagement with the energy transition. Additionally, understanding how the Utility Regulator's duty to foster a coordinated and efficient gas industry aligns with consumer expectations of a Just Transition is vital for creating a fair, practical, and sustainable energy future for Northern Ireland.

Energy Literacy

firmus energy networks welcome the Utility Regulator's efforts to develop an in-depth understanding of energy literacy issues and how these can be addressed in the context of both the current energy market, future market, and the Just Transition to net-zero. Energy literacy is a critical component of enabling consumers to make informed decisions about their source of heat and their energy consumption. It also influences how consumers engage with the evolving energy market and can encourage participation in the transition to a low-carbon future.

Designing and procuring qualitative research on consumer engagement with the energy market is an essential step in understanding the barriers and opportunities for improving energy literacy. This research should aim to identify the gaps in consumers' understanding of energy issues, including how the market operates, what options are available to them, how they can reduce their energy usage or choose lower carbon alternatives and how to navigate future changes such as the integration of renewable energy and low-carbon technologies. It is important that the research also examines how energy literacy can support consumers in making the most of the opportunities arising from decarbonisation.

Energy Hardship: Non-domestic consumer lived experiences

firmus energy networks supports the Utility Regulator's proposed qualitative research into non-domestic consumers' lived experiences with debt and difficulty paying energy bills. Understanding the challenges faced by these consumers is crucial for ensuring that the regulatory framework continues to protect their interests and provides appropriate support. If the research indicates factors that might lead non-domestic gas users to switch away from gas or reduce consumption, it is important that the Utility Regulator flags these potential trends with industry. This early identification will allow stakeholders, including DNOs, to proactively address these concerns, aligning with broader goals of energy sustainability and the long-term viability of gas networks in Northern Ireland. Recognising and addressing these challenges early will help to mitigate the risk of negative impacts on gas consumption and network stability.

Best Practice framework project for electricity, gas and water

firmus energy networks has actively participated in discussions with the Utility Regulator, Suppliers, and other DNOs regarding the development of the Customer Care Register. While we appreciate the efforts made so far, we have raised concerns about the challenges of implementing a gas industry-specific register as a short-term measure within this year. Through our ongoing engagement, we have gained valuable insights into the requirements for a gas industry-specific register and believe the timelines outlined in the Forward Work Programme (FWP) may be ambitious.

While we recognise the benefits of a fully centralised Customer Care Register across utilities, we believe that careful consideration must be given to what is truly in the best interest of vulnerable customers and specifically if a gas industry register would provide tangible benefits to vulnerable consumers, and whether its implementation within the current timeline is feasible. It is crucial that we set realistic expectations for what can be achieved this year and over the five-year duration of the Best Practice Framework project.

Given that the ultimate goal is a centralised, cross-utility register by the end of the five years, focus should be on laying the proper foundation for this. If the Utility Regulator continues to view the creation of a gas industry-specific register as essential for the welfare of vulnerable customers, it should be designed and implemented with a long-term perspective to ensure it is future proofed and can integrate with other registers across utilities to achieve the intended objective of a centralised Customer Care Register by the BPF project's conclusion. The timelines to achieve this must be realistic and facilitate this goal. As we enter the second year of this five-year project, it is important to adopt a pragmatic approach. This will ensure that the register is not only achievable but also sustainable in the long run. In the interim, the industry working groups should focus on improvements to existing customer care register information shared between supplier and DNO, developing a more co-ordinated, streamlined and efficient process for capture of relevant information that aligns with the long-term goal of a centralised utilities-wide Customer Care Register. Taking these steps now will help make significant progress toward a centralised Customer Care Register, reduce duplication of effort, and simplify the data management process.

In conclusion, firmus energy networks appreciates the Utility Regulator's ongoing commitment to engaging with stakeholders through its 2025 Forward Work Programme and welcomes the opportunity to provide feedback on the proposed projects. We fully support the emphasis on the Just Transition to Net Zero, the importance of understanding consumer expectations, and the continued focus on regulatory frameworks that support the energy transition in Northern Ireland. Collaborative efforts, such as those through the Price Control Working Group and other industry consultations, are crucial for ensuring that all stakeholders, including gas network operators, are aligned on key issues. We remain committed to working closely with the Utility Regulator, DfE, and other industry partners to ensure that the regulatory approach promotes sustainability, innovation, and fairness for all consumers. We look forward to contributing further as these initiatives evolve and to ensuring the long-term success of Northern Ireland's energy transition.

19 **Firmus energy supply**

firmus energy Supply is committed to working alongside the Utility Regulator (UR) as it delivers the projects proposed in the Forward Work Plan (FWP).

We note the New Meter Solution for the gas market in Northern Ireland (NI) is not included in the plan for the year. Upon completion of the tender process the project will require significant input from all stakeholders to ensure the successful roll out in a timely, cost-effective manner that brings the benefits of the

new meter to prepayment gas customers within NI.

We believe this project should be called out in the plan alongside the Smart Meter rollout for electricity customers. firmus energy Supply welcomes the opportunity to respond to the Utility Regulator's Forward Work Programme for 2025/26. We appreciate the visibility that the plan provides showing the proposed practical delivery of the strategic objectives outlined in the Corporate Strategy 2024-2029.

As the economic regulator for Gas in Northern Ireland we note the importance of the SPC, included as a project on the plan. These price controls offer an opportunity for support for suppliers in their endeavours for innovations in the gas market, to be adequately resourced to meet and exceed in the delivery of the strategic objectives and the drive to help deliver a Just Transition.

We have outlined in our response to question 2 that we believe the New Meter Solution for the gas market should be a project within this plan. This solution should see a significant improvement in metering technology for pay as you go customers and stakeholders through both the new meter and the meter management system. However, there will be significant costs and it is imperative that adequate allowances and support are provided as part of the SPC to deliver the best results.

At firmus energy Supply we are committed to providing outstanding customer service in each and every interaction with our customers. We therefore welcome both the ongoing, and new, engagement with the UR and other stakeholders to deliver the projects under objective 4. We believe that the levels of customer service and protection within NI are already of a high standard, strengthened during 2024 with the introduction of the Code of Practice for Consumers in Vulnerable Circumstances.

firmus energy Supply has been an active participant in the review and implementation of the Consumer Energy Charters. We remain fully engaged in this process and will continue to work alongside the UR and other stakeholders to provide support and enhanced protection to domestic and small business customers during the winter period.

We appreciate the importance of the work stream around Energy Literacy and gaining an insight into consumer understanding of energy within NI. The results of this workstream can help shape what is required from the gas industry to ensure NI consumers have knowledge of energy use, its impacts, its source and can make informed decisions on their energy and around the Just Transition.

The Best Practice Framework remains on the FWP and we will work alongside the UR as they continue to deliver under the principles of the final decision paper. We welcome discussions on the Customer Care Register, how this can best be taken forward and when is the appropriate time to do so to deliver the best results for consumers.

We note, and are in agreement with, the development and support provided to the UR staff, alongside possible further recruitment, to enable the challenging FWP to be met. firmus energy Supply is fully committed to actively participating in the FWP projects during the next 12 months. However, we would ask the UR to be mindful of the limitations suppliers can face regarding available resource as they contribute to the workstreams alongside delivering other regulatory initiatives and high standards of customer service.

We look forward to our continued engagement with the UR as we support the delivery of the plan. We recognise the importance of stakeholder engagement in the success of the delivery of the projects and can assure the UR of our willingness to assist.
