



Fiona Gallen  
Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

5 November 2024

**Re: Notice and consultation on new digitalisation licence conditions for SONI and NIE Networks**

Dear Fiona,

I am writing regarding the consultation on new digitalisation licence conditions.

**The Consumer Council**

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

The Consumer Council has specific statutory duties in relation to energy, postal services, transport, water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

**The role of SONI and NIE Networks in delivering for Northern Ireland consumers**

As the Transmission System Operator (TSO) and Distribution Network Operator (DNO) for Northern Ireland, SONI and NIE Networks play a pivotal role in the development to digitalise and share energy system data and support accountability to provide benefits for consumers in Northern Ireland.

**Views on the overall licence modifications**

The future energy system, as it transitions to net zero, will need higher quality data than is currently available. Digitalisation is critical to achieving consistent, reliable, accessible and timely data between transmission and distribution.

The Consumer Council welcomes the objective within the licence modifications requiring SONI and NIE Networks to produce a joint Digitalisation Strategy and Action Plan. The joint strategy and action plan should succeed in increasing transparency and accessibility of the companies' plans to digitalise and share energy system data, to ensure that their plans are aligned, that they are accountable for providing benefits to consumers in Northern Ireland and that they prioritise the needs of stakeholder.

The potential benefits to consumers will be expanded in more detail within the subsequent action plan, however the Consumer Council anticipates these benefits will include strengthened customer services, whole system mitigation and improved reliability.

We welcome that the proposals follow on from prior engagement with the industry and consideration of the regulatory approach adopted on other jurisdictions, particularly GB and agree with the Utility Regulator view that further regulation is required, primarily in the area of how consumers will benefit from the planned digitalisation.

The proposed Licence amendments reflect the independence of SONI and NIE Networks, incorporating “best endeavours” concepts and a dispute resolution process to enable progress to be made when a mutually agreed approach cannot be met.

We have outlined our feedback below, which we hope is useful.

- The Digitalisation Strategy and Action Plan refers to energy system data and not consumer data but highlights the need to comply with Data Protection legislation.
- NIE Networks and SONI must publish their strategy and action plan in an accessible way.
- NIE Networks and SONI are required to take account of the consumer interest, deliver consumer benefits aligned with stakeholder needs, and ensure digitalisation benefits are shared fairly with consumers, but no details are provided.
- The Utility Regulator sees the data and digitalisation as a regulated asset which consumers pay for and so they should benefit and be protected from any inappropriate use as the data becomes commercialised. This underpins the principle of alignment of stakeholder needs to consumers receiving a fair share of the benefits.
- We support the Utility Regulator’s approach that NIE Networks and SONI should be incentivised to work together to determine digitalisation solutions that lead to a more efficient energy system, that provides accessible access to energy system data and insights and that lead to benefits for consumers.
- We welcome the requirements for NIE Networks and SONI to consult at each stage on the strategy, action plan and updates, and to explain how they have taken feedback into account.

***What digitalisation consumer benefits (including energy system data sharing) should and can be delivered over the following time frames a) today b) over the next 6 years and c) longer term to deliver net zero and related targets?***

Whilst we cannot comment on delivery time frames, our view is that digitalisation consumer benefits should include the following:

- support vulnerable consumers (particularly those marginalised from energy efficiency advice).
- improve the consumer experience when seeking to connect energy-intensive devices such as electric vehicles or heat pumps and deliver a positive cost benefit.

***How should consumers receive their fair share of the benefits?***

Based on our most recent research<sup>1</sup> many consumers are concerned about the scale of their energy bill, so would see most benefit through lower tariffs or support to reduce their overall consumption. Improved transparency of data, provided in an accessible format, could also be seen as a benefit, through providing information on alternative tariffs and/or energy savings advice.

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<sup>1</sup> <https://www.consumercouncil.org.uk/research/northern-ireland-consumers-cost-living-pulse-survey-augustseptember-2024> The vast majority of respondents (94%) were concerned about home energy prices.

***How can we ensure that digitalisation delivers benefits for consumers as opposed to solely for market participants and shareholders?***

The consultation focuses on digitalisation of system data, so we consider that NIE Networks and SONI will need to be clear which digitalisation initiatives will benefit consumers directly and those which will lead to benefits over a longer timescale through improved operational efficiency or reduction in constraints and justify the costs.

***What data do NIE Networks and SONI need to share with different stakeholder types to support consumer benefits over these time frames? How should the data be shared to benefit consumers?***

We have no comment on the data to be shared but stress the need for all data to be clear, simple and accessible. We believe it is important, particularly in a small market, that the requirement to pursue data and digitalisation is proportionate and targeted at actions that make a material, positive impact.

***What barriers prevent delivery for stakeholders and consumers?***

We highlight communications as a potential barrier to raising consumer awareness, particularly for vulnerable consumers and/or those unwilling or unable to access the world of digital.

We look forward to continued collaboration with you and your colleagues.

Yours sincerely,



**Raymond Gormley**  
**Head of Energy**