



**MANUFACTURINGNI**

## ***Response to the Energy Strategy for Northern Ireland***

**30 June 2021**

***We are content for this response to be published.***

## Introduction

Manufacturing NI represent some 550 manufacturing businesses across every constituency represented in the NI Assembly.

We are a wholly independent voice on behalf of manufacturers who are amongst the largest energy users in Northern Ireland. They ask that we work on energy issues to ensure competitiveness within the UK, on the Island and Ireland and in markets in Europe and globally as this defines their ability to trade and sustain jobs. Our independence on energy issues is critically important to them and us. To deliver this on energy issues we engage but do not accept financial contributions from energy firms or have their representation on our Board or sub-groups.

Manufacturing represents around 14% of local GDP and approximately 11% of total employment. With around 70% of manufacturing taking place outside of Belfast, it's impact on local economies is more pronounced with, for instance, more than 1 in 4 jobs in Mid-Ulster and more than 1 in 5 jobs in the new M&EA and ABC Council areas being a direct manufacturing job with a further 1.2 jobs per job supported in indirect and induced markets meaning that half of jobs in Mid Ulster and 4 in 10 jobs in Mid and East Antrim and Armagh Banbridge and Craigavon Council areas depend on the sector.

## Background to the sector

**Manufacturing makes a substantial difference to the Northern Ireland economy.** The sector directly provides c90k jobs and made a Gross Value Added contribution of almost £5 billion to GDP.

**The impact of Northern Ireland's manufacturing sector is strongly felt throughout the economy supporting jobs across all Northern Ireland and in rural and urban areas alike.** The contribution that the sector makes extends significantly beyond the jobs, economic activity and wages directly associated with the sector. There is an additional indirect impact in the supply chain as a result of the manufacturing sector's procurement of goods and services from other parts of the Northern Ireland economy. In addition, there is a further induced impact, comprising the economic benefits that arise as the people employed in the manufacturing sector and its supply chain spend their wages in the local consumer economy, for example at retail and leisure establishments.

Including all three channels of economic impact—direct, indirect and induced—the total contribution of manufacturing to the Northern Ireland economy is over £10 billion.

In total, it is estimated that more than 220,000 jobs; amounting to a quarter of all jobs in the Northern Ireland economy. For every manufacturing job in Northern Ireland, another 1.5 are supported elsewhere in the economy. By sustaining this level of employment, manufacturing directly contributes more than £2 billion in wages to its own staff, and a further £2.5 billion in wages through jobs supported outside the sector itself.

**The manufacturing sector's impact goes well beyond its immediate or core economic impact.** Wide-ranging benefits are created for the Northern Ireland economy as its activities boost economic activity elsewhere in the economy.

## Summary

*This consultation is deeply disappointing and in parts reckless. History has shown us that those who take from the energy sector win at the expense of the consumer who fund 100% of the market. The Strategy seeks to continue this process but stripping away fundamental protections for consumers making no real attempt to take care of the most important participants in this transaction... those who pay.*

*The energy trilemma remains true. Balance is required between decarbonisation, security of supply and cost yet this is largely ignored and instead many of the proposals are focused on the development of the energy industry itself. There is a very flimsy attempt to mask this through chapters on protecting consumers and talk of potential economic opportunities, but the thrust of the paper is clearly to support energy interests rather than consumers both domestic and industrial.*

*Our fear is that the process is either captured by well-resourced energy interests or the direction established right at the start was selected to support those interests. This is most starkly brought in to focus when we read that none of the options under consideration have been cost tested and will not be tested prior to selection. This is unacceptable.*

## Consultation: Our Response

Q1: Do you agree with the overall goal of achieving net zero carbon energy no later than 2050?

***Yes. However, this does present significant cost and competitiveness problems for industry which from the outset in this draft strategy have not been considered.***

Q2: Do you agree with the proposed outcome of “net zero carbon and affordable energy” for the Energy Strategy?

***Yes. However, there is little evidence from the work presented to date that consideration has been given to “affordable energy”. Indeed, some of the documents make that clear, particularly the “Decarbonisation Scenarios” document which clearly states, “We have not sought to model the potential costs of any of these scenarios, none of which are expected outcomes from the Energy Strategy.”***

***These documents further go on to say, “Our approach to measuring and monitoring costs will be focused on actual policies and pathways we are proposing”. This admission makes it clear that there is only a passing interest in the cost and who pays for this transition. The process has either been captured by lobby interests or the authors have had predetermined outcomes from which the draft strategy has been written. This is unacceptable.***

Q3: Do the five principles identified provide clear direction around the approach that we want to take with the Energy Strategy?

***In principle, yes. However, it appears that consumer interests do not have equal weight to the interests of the energy industry itself. Indeed, it appears clear that in moving from the existing strategy to a new strategy sees consumers interests demoted. Previous plans were built on three pillars – Security of Supply, Price and Decarbonisation. Despite our concern that ‘Price’ did not receive the same policy support as security of supply and decarbonisation there was an acceptance that the protection on the bill payer was a responsibility of policy makers and regulators.***

***This is now significantly diminished in this draft strategy and an attempt made to mask this with other potential opportunities. Experience tells us that energy interests have been handsomely rewarded under the old plan. Electricity and heat generators have, as evidenced in accounts and courts, done well at the expense of mostly the consumer. This new plan as written risks the same thing happening.***

Q4. Are there any key delivery priorities for the Energy Strategy not captured? If so, please outline what you believe should be included.

**Yes, price, security of supply and competitiveness.**

***Our households have half the disposable income of Great British households and twice the level of indebtedness. They cannot afford significant cost rises.***

***Our larger energy users continue to have some of the most expensive electricity prices in the world. Being at the end of every supply chain every fraction makes a difference.***

***Yet there has deliberately been no attempt to cost the options laid out in the plan before seeking views on which direction to take. This creates the feeling that the interests of consumers are secondary to plans by the authors to achieve other aims.***

Q5. Do our proposed indicators adequately allow us to measure success at achieving the proposed Energy Strategy outcome? If not, please advise on what alternative metrics should be used.

a) Carbon emissions from energy-related sectors

**Yes**

b) Jobs and turnover in the low carbon and renewable energy economy

***Yes, but why is this given priority over bill payers?***

c) Domestic energy costs relative to household income

***Yes, but this is measuring the wrong thing. There are many costs facing families. What should be measured is relative to disposable income which is a better measure of family 'wealth' and their ability to pay. Households have made it clear to policy makers, they support decarbonisation, but they are not willing to pay for it. This is largely due to the pressures which family incomes face.***

d) Business energy purchases relative to business turnover

***No. As with households above measuring relative to turnover is completely irrelevant and indeed dangerous. The costs of energy has cost Northern Ireland jobs and a big hit on exports, GVA and family incomes as a result. Beginning this new strategy process without recognising and recalling the devastating impact that poor or weak policy making in the past has made is unacceptable.***

***Michelin in Ballymena successfully employed hundreds of people for more than a generation in Northern Ireland. When deciding where their next generation of tyres were to be made the cost of energy in NI was their Achilles heel as made clear by their UK CEO. As a result, 900 jobs were lost and a further 1,800 jobs in the supply chain and induced economy. The resulting hit to the GVA of the area was in hundreds of millions of pounds. Not considering this in any new plan tells us that we are beginning from the wrong place entirely.***

e) Households in fuel poverty

***No. The consultation says, “ensure a focus on affordability for the most vulnerable households”. This should be ALL consumers.***

f) Relative electricity & gas prices

***The energy industry were completely against this (and indeed electricity generator profits) being made available to consumers and it was only after considerable effort from consumer representatives (including us) that this information began to be recorded and published. It is vitally important that this is not only continued but strengthened particularly considering the revelation in these papers that the cost on consumers will not even be considered until AFTER a policy choice has been made. There must be transparency and there must be an opportunity for policymakers to stop, review and potentially alter course.***

Q6. Do you think there are significantly different illustrative scenarios which should be developed? If so, please provide further information.

***No. The price and cost to consumers must be provided before decisions are made to progress to any potential strategy.***

### **Placing You at the Heart of our Energy Future**

Q7: Do you agree with the four consumer population groups we have identified? Please advise on key considerations within each.

a) Domestic vulnerable consumers

**Yes**

b) Other domestic consumers

**Yes**

c) Small businesses

**No. By numbers, 93% of businesses are micro businesses with 7% being SMEs. A new category is required.**

d) Larger businesses

**Yes. Whilst these manufacturers represent 1% of firms, they account for half of the jobs and half of the turnover. They dominate export and external sales and are the largest energy users propping up the market and protecting households from huge bills.**

Q8: Do you agree with the five measures identified to “enable and protect” consumers? If not, please outline what else should be included?

- a) Making available information and advice
- b) Offering proactive “wrap-around” support
- c) Providing financial support measures
- d) Driving change
- e) Reviewing statutory protections

**We believe there is insufficient protection provided here. It reflects the mistake at the core of this strategy that consumers should simply be seen as contributors and the pain they continue to endure on cost should be ignored to achieve other aims notably in supporting the energy industry itself.**

Q9: Do you agree with the proposed scope of the “one stop shop”? Please advise on any different activities you think should be included.

**No response**

Q10: Which approach do you think should be taken to create this organisation? Please outline your rationale.

**If one should be developed, it must have significant and not token consumer representation.**

Q11: Do you believe that additional financial assistance to protect certain groups of consumers should be introduced? If so, please identify what consumers should be targeted and what support would be needed.

***All consumers should be protected. Job losses are the quickest route to pushing families into fuel poverty.***

### **Grow a Green Economy**

Q12: Do you agree with the four identified priority clean energy sectors:

- a) Energy efficiency
- b) Renewable energy
- c) Hydrogen economy
- d) Circular economy

Please advise on any additional areas that you believe should be prioritised and your reasons for this.

***There are opportunities from these, but history has told us that the energy industry itself has chosen not to support local innovation or supply chains despite the investment of all NI consumers in their profitability. Any new strategy must lock in local economic benefit such as insisting on % of local content in any development and a commitment from project promoters to provide access to their projects and supply chains elsewhere.***

Q13: Do you agree with the economic growth opportunities identified within energy efficiency? What supporting policies do you believe are needed to take advantage of these?

**Like above there should be an insistence on developing the local supply chain.**

**Additionally, it is not clear the authors have studied or understood the barriers to energy efficiency locally. For instance, business contributes 80% of the cost of the NISEP programme but has access to only 20% of the funds. The result is the level of support for business to make energy efficiency investments is unattractive.**

Q14: Do you agree with the economic growth opportunities identified within renewable energy? What supporting policies do you believe are needed to take advantage of these?

***Technology is now sufficiently mature that it does not require support.***



Q15: Do you agree with the economic growth opportunities identified for hydrogen production, demand and manufacturing within the hydrogen economy? What supporting policies do you believe are needed to take advantage of these?

***We may well be too late adopters to this. There are some efforts in using hydrogen as a road fuel but so far these vehicles are 3x the cost of diesel vehicles. If these prices are to drop to affordable levels it will require Government itself, starting with the NI Executive, to make significant investments in new fleet for public transport. Will the Executive make the necessary investment?***

Q16: Do you agree with underpinning principles identified within the circular economy? What supporting policies do you believe are needed to take advantage of the potential economic opportunities?

Q17: Do you agree that we should develop a green innovation challenge fund? If so, what scale and type of innovative projects should this support?

***In principle, yes, but by who? Consumers are already over invested in this. Funding should come from the energy industry or Government alone.***

Q18: Do you believe that we should work with the Utility Regulator to review how energy regulation can facilitate a green recovery and green innovation? If so, how can this be done in a way which protects consumers from the higher risks associated with innovation projects?

***The Utility Regulators primary function is to protect consumers. This should not change.***

Q19: Do you agree with a focus on research mapping, research funding, business linkages and UK opportunity scanning to maximise the impact of the local research base with clean energy specialisms? Please identify specific opportunities in the local research base that could be progressed.

**Yes.**

Q20: Do you believe that utilising and tailoring existing education and training routes can meet the short-term skills needs of the clean energy sector? How can activities within these routes be shaped to meet the needs of the sector?

***Yes, but all sectors are short of people and shorter of people with the necessary skills. The focus should be on export and external sales sectors which provide income rather than similar consumption within our economy if we wish to grow.***

Q21: Do you agree with the proposal to establish an Energy Skills Forum to shape the future skills needs of clean energy sector? If so, what do you believe the role, remit and membership of such a group should be?

**Content.**

Q22: Do you believe that there is a need for specific measures aimed at ensuring a just transition in Northern Ireland? If so, please advise on what the focus of these should be in addition to the education and training routes already proposed for a low carbon workforce.

***“Just transition” is largely focused on fossil fuel industries. Except for our larger power stations and domestic home heating sector few are engaged in this side of business. There is clear evidence that owners of these power stations have been unwilling or unable to make investments required to make these power plants efficient instead focusing on return on investment at the expense of and unwilling consumer left with no affordable alternative.***

### **Do More With Less**

Q23: Do you agree that an energy savings target should be set for Northern Ireland?

***Yes, but targets should not be absolute as there are other considerations including economic development, targeting social need etc.***

Q24: Do you agree that Minimum Energy Efficiency Standards should be set to drive improvements in energy efficiency? If so, what buildings should be the early priorities for introducing minimum standards?

**Yes. This should begin with the Government’s own estate and new builds based on changes to building regulations.**

Q25: Do you agree with the general scale and proposed pace of change outlined in DoF’s five phase plan for building regulations? If not, please outline what achievable timescale or programme should be implemented and your rationale for this.

**Yes.**

Q26: Do you think that we should seek to explore how the rates system can be used to encourage energy efficiency? If so, please outline key issues that would need to be considered.

**No.**

Q27: Do you agree that we should introduce a pilot domestic retrofit scheme by spring 2022, followed by a substantive scheme as part of a “one stop shop” approach? If so, what changes are needed to the wider energy efficiency support landscape to ensure a joined-up approach?

**No.**

Q28: Do you agree that we should ring-fence the PSO funding for vulnerable consumers including the fuel poor? Please advise on changes you believe should be made to the level and scope of the PSO for energy efficiency.

**No. All consumers should be offered equal protection. The PSO scrapped would benefit all consumers.**

Q29: Do you believe that green private finance solutions have a role to play in supporting domestic consumers to invest in energy efficiency? If so, what specific green finance solutions should be explored?

**No response.**

Q30: Do you agree that Invest NI should deliver a pilot energy efficiency support scheme for businesses, to be followed by a substantive scheme delivered through the proposed “one stop shop” organisation. If so, what type of support do you believe is most appropriate for different groups of business consumers?

**There should be a continuation of existing or recently expired schemes to create a new scheme which meets the needs of business.**

Q31: Do you believe that green private finance solutions have a role to play in supporting non-domestic consumers to invest in energy efficiency? If so, what specific green finance solutions should be explored?

**That is for the market to decide, not Government nor using consumers money levied on bills.**

Q32: Do you agree that we should seek to develop skills and capability, enhance quality assurance and standards, and use an accreditation body to provide guarantees on work undertaken by the energy services for retrofit sector? If so, how can we help to prepare the sector for these changes?

**Yes.**

Q33: Do you agree that information, awareness and behavioural change should be a key strand of future energy efficiency support? If so, what are the key behaviours that should be targeted?

**Yes. But should be based on reward and not penalty.**

Q34: What measures do you think can have the most impact to support people to reduce the miles they travel in private vehicles? Please explain your rationale.

***Covid has already created this cultural change.***

### **Replace Fossil Fuels With Indigenous Renewables**

Q35: Do you agree with setting a 70% renewable electricity target by 2030, whilst retaining the flexibility to increase this to 80%?

***Yes, but not at the expense of security of supply nor unaffordable levies on consumer bills. Any decision is reckless without knowing the full extent of the costs on the consumer or the risks around security of supply as is admitted in this consultation.***

Q36: Do you agree with the criteria identified that would allow to consider any future increases in the renewable electricity target?

- a) Projects can be delivered in a cost-effective manner.
- b) Offshore wind can be delivered by 2030.
- c) Storage technologies can minimise system curtailment of renewables.
- d) Greater clarity on electricity demand for heating and transport.
- e) Consumers' bills are not disproportionately impacted.

If not, what alternative criteria might be used?

***We agree, however, the costs on the consumer and the wider impact on the economy appears to be considered irrelevant in this consultation.***

Q37: Do you agree that we should explore with BEIS the possibility of extending the Contracts for Difference scheme to Northern Ireland? If so, what terms would be needed to ensure generation in the region whilst protecting consumers?

***No, we don't agree. The UK energy market is the most expensive in Europe and one of the most expensive in the world. Their design is not a model which provides security nor affordability. Other global models would be better explored.***

Q38: Do you believe it is possible that an offshore wind project in Northern Ireland could be operational before 2030? If so, please outline what targeted actions could be taken to deliver this.

***Neither or planning system nor connections availability is suitable.***

Q39: Do you believe that a fixed platform offshore wind project should be targeted to be part of the renewable generation mix? If so, how would you propose some of the challenges associated could be overcome?

***Not unless there is a cost-effective way to deliver this. The economics for this are unclear to us.***

Q40: Do you believe that floating platform offshore wind offers the best long-term opportunities for offshore wind in Northern Ireland's waters? If so, what additional steps could be taken to encourage these projects?

***As above.***

Q41: Do you believe that other marine renewables can play a key role in our renewable generation mix? If so, please identify what technologies offer the greatest potential and what steps can be taken to support these.

***Possibly, provided the economic model stacks up including the use of the local supply chain and provided there is no adverse impact on consumer bills.***

Q42: Do you agree that a strategic approach to planning the location of renewable projects should be taken? If so, please outline practical steps that could be taken to deliver this.

***Yes, but it should be focused on where energy demand is. The opportunity is to the West of NI yet elsewhere in the Department there continues to be resistance to a sub-regional economic development strategy.***

Q43: Do you believe that there should be a requirement for renewable developers to share some of the financial benefits of developments with local communities? If so, what share do you think would be reasonable? If not, please provide your rationale.

***Yes, however the priority should be on the most efficient cost of dispatch in the interests of all consumers.***

Q44: Do you agree with taking separate approaches to on-gas grid and off-gas grid consumers? If not, what approach should be taken?

***Yes. Consumers meeting their own energy demand, including from greener sources, should be encouraged. This should extend to the ability of these investments to be 'wheeled' to support more than a single site.***

Q45: Do you agree that we should not rule out potential low and zero carbon heat solutions at this stage? If not, please outline your rationale.

***Yes. From here to zero is a costly and economically dangerous step. Lower carbon or greener fuels have a role to play.***

Q46: What low and zero carbon heat solutions do you believe we should prioritise for trials? Please identify where such trials should be focused and what key issues should be tested within each.

***Biogas CHP and heat pumps.***

Q47: Do you believe that the role of heat pumps will be different depending on whether consumers are on or off the gas grid? Please outline what you think the specific roles should be.

***Yes. Energy independence should be supported.***

Q48: Do you agree that Northern Ireland should develop a pilot grant scheme to support low carbon heat technologies for domestic and small non-domestic consumers? If so, please identify key issues that need to be considered in designing and delivering such a scheme.

***Yes, but the cost of this should not be borne by other consumers. Alternative sources of finance should be found to support the grant system.***

Q49: Do you agree that legislative and regulatory steps should be taken to facilitate biomethane injection into the gas network?

***Yes, greener gas has a role and should be supported by regulatory steps.***

Q50: Do you believe that support should be provided to encourage biomethane production for injection into the gas network? If not, please outline what alternative approach should be taken to decarbonising the gas network.

***Yes.***

Q51: Do you agree that the local Gas Network Operators should develop and publish a plan to decarbonise gas out to 2050? If so, what key issues must be considered within it?

***Yes, but the road to net zero should not be travelled only by the energy sector. Others have a role also meaning there could and should be a role of greener gas to protect consumers and ensure security of supply which cannot be met by renewable and electrification routes only.***

Q52: Do you agree that the sale and installation of new oil boilers should not be allowed for consumers on the gas grid? Please outline your rationale and, if you agree, what a viable timeline for introducing this might be?

***For new build only, yes. Replacement oil boilers should be permitted as this is the most cost-efficient route compared to a new gas installation for most consumers.***

Q53: Do you believe that off-gas grid consumers should have the option to retain oil boilers for use with biofuels? If not, what is a viable timeline for introducing a ban on the use of all oil boilers?

**Yes.**

Q54: Do you agree that the local Oil Industry should develop and publish a plan on how biofuels could play a role in decarbonising heat out to 2050? If so, what key issues must be considered within it?

**Yes.**

Q55: Do you believe that support should be introduced to promote the uptake of biomass for off-grid consumers? If so, please advise on what support is needed and where it should be focused.

**Yes, but market led not necessarily financially supported by other consumers.**

Q56: Do you agree that the sale of coal and wet wood should be banned in Northern Ireland? If so, do you believe this should be extended to include other solid fuels except for kiln dried wood?

**Yes.**

Q57: Do you agree that we should develop a Northern Ireland specific strategy that sets an overarching, long-term plan for cleaner, greener transport and shows how we will meet net zero emissions within the transport sector? If so, what Northern Ireland specific issues need to be factored into this in order to accelerate the uptake of Zero Emissions Vehicles?

**Yes.**

***We have a rurally dispersed population and much of the economic activity (particularly relating to exports and external sales) are in areas which are not and cannot be served efficiently by public transport and the expense of charging infrastructure would be costly if at even possible given that renewable have eaten up much of the headroom in our electricity network in these rural (mostly western) areas. Individual transportation will remain necessary and a move to zero emission vehicles may not be suitable. Alternative, greener fuels needs support to.***

Q58: Do you agree that an EV communication campaign should be run in Northern Ireland? If so, what key messages would be most impactful for consumers as part of this?

***No. The car makers themselves will do this without the need for public or consumers money to be wasted.***

Q59: Do you agree that the private sector and local government have a key role to play in developing EV infrastructure? If so, what barriers can government address to ensure that such projects are commercially viable?

***It is a chargeable fuel so should be left to the private sector. Local government's role should simply be to support the planning process and approvals quickly and efficiently.***

Q60: Do you agree that we should develop an EV Charging Infrastructure Plan in collaboration with public and private partners? If so, what should the key priorities of the plan be?

***Yes, see above.***

Q61: Do you agree that public sector contracts can be a key driver for developing technologies and markets for alternative fuel vehicles? If so, what specific opportunities are there that could be progressed?

***Yes, but equally they should be used for delivering wider local economic development by insisting on local content.***

Q62: Do you agree that collaborative research will be important to demonstrate alternative fuels? If so, what are the best routes to identify and progress potential projects?

***Yes. There is an opportunity in our City Deal and potentially Freeports.***

Q63: Do you believe that Compressed Natural Gas/Liquid Natural Gas and/or and synthetic fuels can play a role as an interim measure to decarbonising transport? If so, how can government help to encourage the private sector to trial and use these fuels?

***Yes, indeed this is essential. It should not be left to the energy consumer to deliver net zero alone.***

Q64: Do you believe that CCUS can play a role in Northern Ireland? If so, what potential applications could be the initial focus for demonstration projects?

***Yes, but a supportive planning process is required.***

Q65: Do you believe that our approach to petroleum licensing should change in line with our commitment to decarbonise energy?

***Yes.***



## Create a Flexible and Integrated Energy System

Q66: Do you agree that the Electricity Network and System Operators should produce a pathway to creating a flexible and integrated energy system? If so, please provide evidence to demonstrate what the initial priorities of such a plan be?

***As previously stated in this response there is insufficient and potentially reckless regard given to security of supply and cost. What's known as the energy trilemma remains true and relevant but is not given the appropriate attention in this document. The transmission and distribution network providers are beneficiaries from the market, indeed there are financial incentives for them from the planning and delivery of capital projects, so it is important that both policy and regulation are robust enough to protect consumers.***

***Any potential for the production of a pathway must have regulatory oversight.***

Q67: Do you agree that conventional power generation can play an important role in the pathway to decarbonised energy? If so, what opportunities and barriers exist for such plants?

***Yes, however they have not proven themselves willing to invest in their plant sufficiently instead focus on returns for investors and potential onward sale (the same is witnessed in large scale renewable developers) all at the expense of consumers. Indeed, the design of the new SEM was to send market signals to promote more efficient plant to be developed or installed. Instead, these players have taken more, not less from the market and not made the investments required or left and created space for more efficient and greener plant.***

***A more robust regulatory approach is required, with larger penalty, should these plant operators not make the investment required or the space for more efficient and greener alternatives.***

Q68: Do you believe that further interconnection will be needed in the future? If so, is a new revenue mechanism needed to bring forward this investment?

***Yes. However, there is little confidence that the level of transparency on costs is being provided by those tasked with promoting, planning and delivering schemes already planned. A new model is required.***

Q69: Do you agree that our power system should be based around flexible solutions to align demand and supply? If so, please advise on what key decisions are needed to achieve this.

***Yes, but this should also include more flexibility for larger energy users to be self-sufficient including more acceptance of coming off grid (and partially off grid) and wheeling.***

***The affordability of the system depends on large energy users being connected and consuming. Lose them and all other consumers are left with an unaffordable system for now and the future. More appreciation and value should be placed on consumers who can provide half-hourly data to assist in matching demand and supply.***

Q70: Do you believe that the SEM and DS3 offer sufficient market routes to support the deployment of flexible technologies for generators of all sizes? If not, please provide evidence to demonstrate what additional market routes may be needed.

***The cost of DS3 services is rising but there is limited transparency on their impact on consumer bills. Indeed, we believe many of these services are being contracted to generators for project which they should and would have made anyway.***

Q71: Do you agree that a policy framework should be put in place to enhance access to and use of consumer data? If so, please outline key considerations that need to be factored into this framework.

***Yes. Standard data protection rules should apply. This is made easier with an agreement between the EU and UK on data adequacy.***

Q72: Do you believe that we should take forward the Energy Data Taskforce recommendations in Northern Ireland? If so, please advise on key differences with Great Britain that need to be factored in.

***No response.***

Q73: Do you agree that a Cost Benefit Analysis of smart meters should take into account the broader benefits they can bring to consumers as an enabler of energy data and a smart system? If the CBA for smart meters is not positive, what alternative approaches can be taken to deliver these benefits for consumers?

***The domestic consumer market in NI is too small for smart meters to make a significant difference so consumer money should not be spent on supporting this***

Q74: Do you believe that financial support should be provided for micro-generation to increase the number of active consumers in Northern Ireland? If so, what should this support look like? If not, what are the alternatives?

***No. The technology is mature enough and there is enough market signals for these investments to be made without the financial support being provided by other consumers.***

Q75: Do you agree that network charging in a decentralised energy system will need to change? If so, what are the principles that should be adopted in distributing future network costs across consumers?

**No. However, there is a need to bring Northern Ireland consumers in line with other parts of the SEM to ensure competitiveness. The allocation of network costs should be the same North and South.**

Q76: Do you believe that a new regulatory framework is needed to protect consumers who engage in decentralised arrangements? If so, what consumer protection measures should be part of this?

***Yes. There is a need to make energy self-sufficiency possible. Many larger consumers in particular are trapped.***

Q77: Do you believe that energy communities have a role to play as part of the energy transition? If so, what support is needed to progress these? If not, what are the alternatives?

***They are the biggest financial beneficiaries so have a role, but that role requires transparency and oversight with consumers interests at the centre.***

Q78: Do you agree that the potential of geothermal energy should be further explored, supported by a legislative and regulatory framework? If so, what applications do you believe there are for geothermal energy in Northern Ireland?

***Yes, district heating for new developments should be encouraged in regulation.***

Q79: Do you agree that further trials of heat networks should be carried out? If so, what key issues do you think should be tested through these?

***No response.***