



CONSULTATION RESPONSE

Submitted: March 2025 | Contact: shannon.montgomery@nea.org.uk

Consumer Council for Northern Ireland: Draft 2025-2026 Forward Work Programme consultation

About Us

NEA is the national fuel poverty charity, working across England, Wales, and Northern Ireland to ensure that everyone can afford to live in a warm, safe, and healthy home.

NEA NI works to overcome the causes and effects of fuel poverty in four main ways. We provide **advice and support** to people struggling to heat their homes affordably; we **campaign and advocate** for policy and regulation to protect the most vulnerable and end fuel poverty; we carry out **research** to raise awareness and find solutions; and we provide **accredited training and qualifications** to improve standards in energy advice.

Our policy priorities naturally evolve in response to wider government policy and the reality of fuel poverty within households but there are four key areas that NEA NI has long been calling for:

- The introduction of a **statutory fuel poverty target** (NI is the only region of the UK without one).
- The development and implementation of a **new Fuel Poverty Strategy for NI** (currently in progress).



- The introduction of **minimum energy efficiency standards**, especially within the private rented sector.
- Ongoing **financial support for low income and vulnerable households** in NI. This includes both short term measures to boost incomes in response to the ongoing cost of living crisis, but also a longer-term commitment to invest in energy efficiency measures in homes in NI as part of the just transition to net zero.

Consultation Response

NEA NI welcomes the opportunity to respond to the Consumer Council's (CCNI) Draft 2024-2025 Forward Work Programme (FWP). We work closely with the CCNI across many aspects of this work, but especially in relation to energy issues including consumer protection, empowering consumers, and policy development. We value the strong working relationship we have developed, and the CCNI's various consumer tools and research which we promote and encourage individuals to use. We look forward to continuing to work together as we strive to eradicate fuel poverty in NI.

1: Have we captured the right consumer priorities for the next 12 months?

NEA NI believes that the CCNI has captured the right focus and consumer priorities for the next 12 months. The **'Cost of Living'** crisis remains a major challenge for consumers as they struggle to afford even basic essentials, including adequate heating. Recent polling for NEA NI revealed that 40% of NI households are living in fuel poverty¹, highlighting the severity of the issue.

The rising prevalence of harmful coping mechanisms is particularly concerning. Over the previous 24 months, 27% of households reported going without heating or electricity on at least one occasion due to not being able to afford it. This was up from 19% in 2023. In response to cost of living pressures, 70% of respondents reduced their use of central heating, a third resorted to wearing coats, blankets, or using hot water

¹ National Energy Action Northern Ireland, (2024). ['NEA and LucidTalk Poll 2024'](#).



bottles indoors, and 1 in 10 households admitted to skipping meals or cutting back on food². These findings underscore the urgent need for action to support struggling households and we urge the CCNI to do all within its power to advocate on behalf of consumers, particularly those in vulnerable circumstances.

We agree with the CCNI's identification of '**Net Zero**' as a key priority affecting consumers. It is essential that the transition to net zero is fair and just, and that no one is left behind. With 68% of households in NI reliant on home heating oil, this remains a key gap in policy development and one where we continue to call on the CCNI to use its influence to look at how it can extend protections across the oil sector. We do acknowledge the excellent work that the CCNI currently carry out in relation to the oil comparison toolkit online, which we promote and encourage individuals to use.

The transition to net zero will require households to significantly change the way they heat their homes and their energy-related behaviours. As outlined in previous responses, this will be a challenging journey for many households as they will be required to learn new skills and adopt new behaviours to make efficient use of emerging technologies. To support this change, provision will be required to make the transition as simple as possible for energy users. This means it is important to provide clear information, advice, and support for all and we believe that the CCNI will continue to have an important role to play in ensuring this is the case.

We also agree that '**Digital Inclusion**' is a key consumer priority and that all consumers, especially vulnerable groups, must have positive and equal access, opportunities, and outcomes when interacting with digital markets, alongside robust consumer protections. NEA NI believes digital innovation can help consumers participate in a smart, flexible energy market, with smart metering offering significant benefits for low-income and vulnerable households. In particular, we are supportive of the capacity of smart meters to end estimated billing, provide greater control over personal energy use, and to simplify 'pay as you go' payments and emergency support. However, these benefits will only be realised if

² National Energy Action Northern Ireland, (2024). '[NEA and LucidTalk Poll 2024](#)'.



individuals are effectively engaged and supported throughout their smart meter journey.

Finally, we welcome that the CCNI continues to identify ‘**EU Exit**’ as a consumer priority. This is important as we continue to develop understanding of the meaning, opportunities and risks this presents for consumers. We believe the CCNI continues to have an important role in monitoring and planning mitigations against any erosions to consumer rights, protection, accessibility and affordability.

2: Have we identified the right strategic objectives to address these consumer priorities or is there anything we have missed?

Yes, these appear to us to be the right strategic objectives to address these consumer priorities, and through which the CCNI can deliver on its role to champion and safeguard the interests of consumers in NI.

3: Do you agree with the overall direction and project focus of the 2025-2026 Forward Work Programme?

We support the overall direction and project focus, particularly initiatives aimed at empowering, protecting, representing, and understanding consumers in relation to energy. Below, we provide specific comments on key areas.

Empowering consumers

We welcome the emphasis on consumer awareness and engagement (Projects 1-10), as ensuring consumers have access to clear information and practical tools is essential to make informed energy decisions.

- **No. 2: Consumer rights education campaign** – This initiative is crucial. It should comprehensively address consumer rights in all aspects, including energy access and affordability.
- **No. 6: Energy advice and outreach programme** – This is a very welcome initiative. We encourage the CCNI to do all it can to ensure outreach is wide and reaches the organisations and people that need it most.



- **No. 9: Energy tools to save money** – We strongly support this project. The CCNI’s digital resources, particularly energy price comparison tools, are invaluable for domestic energy consumers, and we frequently refer to them in our work to educate and support vulnerable households. We urge CCNI to continue highlighting standing charges and explore ways to enhance consumer understanding of their impact - especially for pre-payment meter (PPM) users. Given the growing trend of suppliers separating costs into unit rates and standing charges, improving transparency in this area is increasingly important.
- **No. 10: Save Money Save Energy consumer campaign** - We are keen to learn more about this initiative and would be happy to collaborate in supporting its objectives where possible.

Influencing policy

We acknowledge and support the CCNI’s efforts to influence policy. As a charity dedicated to advocating for policy and regulation to protect the most vulnerable and end fuel poverty, NEA NI recognises the CCNI’s critical roles in representing and safeguarding consumer interests in energy policy and regulation.

- **No. 22: Safeguarding consumers’ interests in energy** - The review of the Energy Strategy, the development of a new Fuel Poverty Strategy, and the Smart Meters Design Plan will all be pivotal in addressing the needs of vulnerable consumers. We look forward to continued collaboration with CCNI to influence these areas and drive meaningful progress toward eradicating fuel poverty in NI.
- **No. 23: Consumers and their transition to net zero** – We are interested in learning more about this project and its scope.

Protecting consumers

We welcome the CCNI’s ongoing work to audit complaints with electricity and gas suppliers (No. 30) and its efforts to protect consumer interests in price controls and tariff reviews (No. 31).

- **No. 32: Consumer protection in energy and water** – We welcome the continued work of the Consumer Protection Advisory Group (CPAG). CPAG needs to play a central role in shaping the



Utility Regulator's Consumer Vulnerability Strategy and the new Fuel Poverty Strategy. We look forward to ongoing collaboration in this space.

Representing consumers

We support the CCNI's efforts to represent consumer interests in energy, particularly in addressing fuel poverty.

- **No. 51: Representing consumers' needs in energy** - We appreciate the CCNI's attendance and engagement with the All-Party Group on Fuel Poverty, for which NEA NI provides the secretariat. Maintaining a strong focus on fuel poverty within the Assembly is vital to ensuring policies and strategies deliver affordable warmth for low-income and vulnerable households.

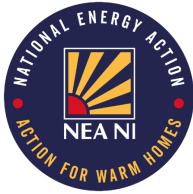
Understanding consumers

Understanding consumer needs and perspectives is fundamental to designing effective policies and support mechanisms.

- **No. 64: Consumer proposition the rollout of smart metering** - We are eager to understand how this project will shape the smart meter roll-out and help ensure effective consumer engagement.
- **No. 65: Fuel poverty and energy affordability** - We welcome the CCNI's research focus on fuel poverty and energy affordability, which complements NEA NI's work in this area.

4: Are there any changes you think we should make to the overall direction and project focus of the 2025-2026 Forward Work Programme?

Below we outline some additional points which we believe should be considered by the CCNI in relation to the fuel poverty landscape and the FWP. It is our belief that these options/recommendations will assist in easing the pressures on vulnerable energy consumers in NI in the longer term, and we hope that the CCNI can support us in our advocacy asks by including them in some capacity within the FWP.



Introduction of the Warm Home Discount (WHD) Scheme (or equivalent) in NI

The WHD scheme in Great Britain provides for mandatory social price support to reduce energy bills for the most vulnerable. Qualifying households in GB receive a £150 discount on their electricity bill between October and March. Each year, the scheme supports round 2 million households, including over 600,000 low-income pensioners. Despite persistently high levels of fuel poverty, vulnerable households in NI do not receive this support. We encourage the CCNI to use its influence to urge the NI Executive to explore mechanisms to introduce an equivalent scheme in NI to help alleviate the financial strain on the most vulnerable consumers.

Support a Review of the Current System of Regulation in NI and Assess how this Compares with the Protections Provided by the Energy Price CAP in GB

The price cap sets a limit to how much energy firms can charge consumers for gas and electricity and was introduced in 2019 to help households who do not regularly switch suppliers. Ofgem, the energy regulator, determines the level of the cap four times a year. Crucially this means price rises are passed through to consumers at set periods, meaning consumers have more time to prepare and react. In contrast, in NI we have seen a rapid rise in energy prices throughout the winter months in recent years. This has meant many consumers have been caught unaware and faced extended hardship during the winter. This is yet another example of households in NI being further disadvantaged in comparison to their GB counterparts, as they cannot avail of the additional protections provided by the price cap.

Targeted Affordability Support for Vulnerable Households:

Many households remain in crisis due to unaffordable energy bills. NEA NI strongly supports the introduction of an **energy social tariff** to provide targeted, discounted energy bill support to low-income and vulnerable households. The draft Fuel Poverty Strategy proposed further investigation into targeted affordability measures, including support for households with higher energy needs. Given the cost-of-living crisis, we believe this work should be progressed urgently, and we encourage the CCNI to advocate for its immediate progression.



Addressing the Risks of Self-Disconnection for Pre-Payment Meter Users

The high prevalence of pre-payment meters (PPMs) in NI puts many households at risk of self-disconnection, particularly during times of acute energy price hikes. However, there is currently limited data available to identify which households are most at risk, making it difficult to provide timely interventions. Tackling this issue should be a priority to safeguard vulnerable consumers. Energy suppliers and network operators must play a key role in identifying and supporting at-risk households, and we urge CCNI to advocate for improved monitoring and response mechanisms.

5: Do you have any comments that would help guide our work on our 2025-2026 Forward Work Programme?

One key area that requires further attention is the **prevalence and impact of pre-payment meters (PPMs)** in Northern Ireland. NEA remains deeply concerned about the challenges faced by vulnerable consumers using PPMs and urges CCNI to prioritise a comprehensive assessment of this issue. Despite PPM prevalence, there remains a critical lack of data on key issues, including self-disconnection rates and the extent of rationing behaviour; consumer experiences in using PPMs, including accessibility and ease of use; payment challenges, such as PayPoint accessibility and reliability. This project should also look at other programmes to tackle debt such as through extending the use of Fuel Direct – something we think is well overdue. **We therefore call on the CCNI and the Utility Regulator to work with industry to design and deliver an in-depth piece of research to uncover these issues relating to PPMs.**