



Elmwood House
74 Boucher Road
Belfast
Co. Antrim
BT12 6RZ

Northern Ireland Office
1 College House
Citylink Business Park
Albert Street
Belfast
BT12 4HQ
Tel: 028 9023 9909
E: Northern.Ireland@nea.org.uk
W: www.nea.org.uk

09 May 2025

Sent by email to: OREAP_NI@rps.tetrattech.com

Subject: OREAP: Consultation on the SEA Environmental Report and RIAA

To whom it may concern,

On behalf of National Energy Action (NEA) Northern Ireland, I am taking the time to write you a short letter in response to the Department for the Economy's 'OREAP: Consultation on the SEA Environmental Report and RIAA'.

[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.

In Northern Ireland, we chair the [Fuel Poverty Coalition NI](#) and are the secretariat for the [All-Party Group on Fuel Poverty](#). NEA NI is also a board member of [EnergyCloud Northern Ireland](#) – a collaboration across the energy generation, transmission, network distribution and supply sector to divert surplus renewable energy, which would otherwise be wasted, to support homes in fuel poverty.

We appreciate this opportunity to input into DfE's ORE policy development, following the publication of two assessment reports. Our key comments are as follows:

- NEA NI supports a fair and just transition to net zero, driven by the needs of energy consumers as the priority.

the national energy action charity

President: Baroness McIntosh. Vice-Presidents: Lord Best; David Green OBE; Baroness Hilton of Eggardon; David Porter OBE; Baroness Maddock; Lord Shipley of Gosforth OBE. Chair: Derek Lickorish MBE. Chief Executive: Adam Scorer.

NEA is an independent charity, Registration No. 290511. Company limited by guarantee. Registered in England No. 1853927. Registered office: NEA, Level 6 (Elswick), West One, Forth Bank, Newcastle upon Tyne, NE1 3PA



- NEA NI sees delivery of the Executive's Energy Strategy, 'Path to Net Zero Energy', as an opportunity to reduce fuel poverty in NI. To achieve this, it is imperative that consumer protection and a fair and just transition remains meaningfully at the forefront of our journey to decarbonisation.
- Urgent action is needed to address the fuel poverty crisis in Northern Ireland. [Polling](#) conducted for NEA NI in September 2024, revealed that as many as 40% of NI households are now living in fuel poverty. This means that choosing between heating and eating is very much a reality for around 80,000 homes.
- Ongoing policy development on ORE is welcome to bring us closer to achieving the Energy Strategy's aims of an affordable, secure, and clean energy system for current and future generations.
- However, we are concerned that as energy systems change, there is a risk that upfront investment costs will be passed on to consumers, exacerbating financial pressures.
- **Therefore, we wish to stress again, that fuel poor households cannot end up being disproportionate sponsors of hitting the renewable electricity target. It is imperative that there is a fair distribution of the cost of decarbonisation with those on the lowest incomes protected.**
- Additionally, we encourage DfE's ORE policy development to include engagement with EnergyCloud NI, to assess how any surplus renewable energy from ORE, which would otherwise be wasted, can be diverted to support homes in fuel poverty.

Thank you for the opportunity to respond and we look forward to continued engagement in this policy area.

Yours sincerely,

Ms. Pat Austin
Director, National Energy Action NI
Chair, Fuel Poverty Coalition NI