Response ID ANON-7X6H-7H6J-C

Submitted to Renewable Electricity Generation Bill
Submitted on 2026-10-20 17:18:37

Introduction

1 What is your name?

name:
[redacted]

2 What is your email address?

email address:
[redacted]

3 Are you providing a submission on behalf of an organisation or business?

Yes

If yes, please provide the name of the organisation or business below:

Community Energy Northern Ireland (CENI) .

We are a local coalition of organisations and individuals with the purpose to create an enabling environment in Northern Ireland for the growth and success of community energy initiatives, empowering communities to actively participate in and benefit from a just transition to a democratic, decentralized, and decarbonized energy system.

The founding organisations are Fermanagh Trust, Drumlin Wind Energy Co-op, Co-operative Alternatives, NICE Ltd.

Consent

4 Please confirm that you have read the Northern Ireland Assembly Committee's Privacy Notice by clicking the button below.

yes:
Yes

5 How would you like your submission to be published?

Yes. Publish in full.

Clause 1 - Overview of this Act

6 Do you agree that Contracts for Difference should be the basis for encouraging renewable electricity generation?

Yes

If no, how should this clause be amended?:

Yes, but not on their own.

CENI agrees that Contracts for Difference (CfDs), through the Renewable Electricity Price Guarantee (REPG), should form a central part of Northern Ireland's approach to encouraging renewable electricity generation. CfDs can provide long-term revenue certainty, support investment in renewable energy projects and contribute to decarbonisation and energy security objectives.

However, CfDs alone will not ensure that the wider economic and social benefits of renewable energy development are shared fairly. The Renewable Electricity Generation Bill presents an opportunity to ensure that publicly supported renewable energy delivers lasting public, economic and community value alongside increased renewable generation.

Northern Ireland should use the REPG to move from a model in which communities primarily host renewable infrastructure and receive discretionary benefits towards one in which communities can participate, own assets and retain a meaningful share of the economic value created.

While CfDs can help accelerate renewable energy deployment, they do not, on their own, guarantee:

community benefit;
community ownership;
shared ownership;
community energy participation;

public confidence;

These outcomes require deliberate policy intervention and statutory support.

Required Amendments
-Insert a statutory purpose recognising community benefit and community energy participation as objectives of the Act.
-Require community benefit arrangements for projects receiving support through the REPG.
-Establish a minimum community benefit framework (£5000 per MW per annum index linked).
-Create a public Community Benefit Register.
-Require annual reporting on community benefit delivery and community participation outcomes.
-Require CfD regulations and allocation rounds to support community-owned and cooperative energy projects.

The Bill currently provides the Department with powers to make regulations concerning community benefit. CENI's paper, Sharing the Benefit of Renewable Energy, argues that these powers should be strengthened to create a clear and consistent community benefit associated with REPG-supported projects.

Community benefit should not, however, be viewed as a substitute for community ownership or shared ownership opportunities. Rather, these approaches should be complementary.

Experience in Ireland and Scotland demonstrates that and Northern Ireland has an opportunity to build on these lessons.

7 Do you agree that the generating contracts should be managed using a counterparty?

Yes

If yes, who should the counterparty be?:

Yes.

CENI agrees that generating contracts should be managed through a designated counterparty. A counterparty model provides a clear and established mechanism for administering Contracts for Difference, managing contractual obligations, making payments and maintaining investor confidence in the renewable electricity support scheme.

An independent counterparty can help ensure consistency, transparency and stability in the operation of the scheme and provides an appropriate separation between policy-making, system operation and contract administration.

However, given the significant public interest role of the counterparty and its responsibility for managing substantial financial flows associated with the energy transition, the legislation should include stronger requirements relating to governance, transparency and accountability.

Recommended Amendments
Require the counterparty to operate in the public interest and be subject to appropriate public accountability arrangements.
Require annual reporting on the operation of the scheme, including levy collection and expenditure, CfD outcomes and the distribution of benefits arising from supported projects.
Require publication of key operational decisions, performance information and governance arrangements, subject to appropriate commercial confidentiality protections.
Require reporting on community benefit delivery, community participation and opportunities for community-owned and cooperative energy projects within the scheme.
Require consultation with relevant stakeholders, including community energy representatives, before significant changes are made to the counterparty's functions or governance arrangements.
CENI Position

CENI supports the use of a counterparty as part of an effective Contracts for Difference framework. However, the counterparty should not be viewed solely as an administrative vehicle. As a key institution in delivering Northern Ireland's renewable energy transition, it should operate with a clear commitment to transparency, accountability, public benefit and support for meaningful community participation in the energy system.

This answer is consistent with the broader CENI message that the issue is not whether Northern Ireland should have a counterparty, but how that counterparty is governed and how the benefits of the energy transition are shared with consumers and communities.

If no, how should this clause be amended?:

8 Do you agree that the costs of the counterparty should be met by a supplier levy?

Yes

If no, how should this clause be amended?:

While the levy mechanism provides an important means of funding Contracts for Difference and supporting renewable energy investment, the public benefit will depend on who is able to access the scheme. If participation is limited primarily to large commercial developers, the direct financial benefits may accrue largely to the private sector while costs are socialised across electricity consumers. The Department should therefore consider how community-owned and cooperative energy projects can access CfD support, ensuring that the economic benefits of the energy transition are retained

within local communities alongside the wider public benefits of decarbonisation, energy security and price stability.

We support the establishment of a levy mechanism to ensure that the CfD counterparty has sufficient and predictable funding to meet its obligations and to provide confidence for investment in low-carbon electricity generation.

However, given that levy costs are ultimately borne by electricity consumers, the framework should ensure that any benefits arising from the mechanism are shared fairly and transparently. In particular:

-Community benefit obligations and support for community energy should be prioritised before any surplus or excess funds are returned or redistributed.
-There should be full transparency regarding the collection, management and distribution of levy funds, including regular public reporting on any surplus balances and how they are used.
-Electricity suppliers should be required to pass through 100% of any resulting financial benefits to consumers rather than retaining them as additional profit.
-Specific protections should be included for vulnerable and fuel-poor households to ensure they benefit fairly from the energy transition.
-The term "excess funds" should be clearly defined in legislation or regulations to provide certainty and avoid discretion that may undermine public confidence.
-Surplus funds should not be redistributed where this would compromise existing commitments to community benefit, local ownership initiatives or community energy development.

We therefore support the levy mechanism in principle, provided it operates transparently, delivers clear public benefit, protects consumers and actively supports wider community participation in the energy transition.

9 Do you have any further amendments that you would like to propose to this clause?

clause 1:

We would like to include amendments to Clause 13 - Community Benefit

CENI welcomes the inclusion of community benefit within the Bill and recognises that Clause 13 represents an important acknowledgment that communities should share in the benefits arising from renewable energy development. However, CENI does not agree with the clause as currently drafted because it creates a discretionary power rather than a clear statutory requirement.

Renewable energy projects supported through the Renewable Electricity Price Guarantee will benefit from a publicly enabled support mechanism. Communities hosting this infrastructure should therefore be guaranteed a fair and consistent share of the benefits generated. The Bill should provide certainty for communities rather than leaving these arrangements entirely to future regulations.

Required Amendments

-Replace "may" with "must". The Bill should require the Department to make regulations establishing community benefit arrangements for projects receiving support under the scheme.

-Establish a minimum community benefit contribution. Community benefit payments should be set at a minimum of £5,000 per MW per annum, index linked, providing consistency, certainty and fairness across projects.

-Define Community Benefit Funds. The legislation or regulations should establish clear principles that Community Benefit Funds should be:

long-term;
predictable;
transparent;
locally accountable; and
subject to democratic decision-making.

-Create a statutory Community Benefit Register. A publicly accessible register should record:

community benefit commitments;
annual payments;
recipient organisations;
funded activities; and
compliance information.

-Require annual reporting. Generators and the counterparty should publish annual reports detailing community benefit commitments, payments made and outcomes achieved.

-Require community-led action planning. Community benefit expenditure should be informed by locally determined priorities and community-led planning processes.

-Support community energy pathways. Regulations should allow community benefit arrangements to support:

community energy development;
capacity building;
feasibility studies;
local ownership opportunities; and
shared ownership models.

-Strengthen monitoring and enforcement. The Utility Regulator should have oversight responsibilities, supported by effective compliance mechanisms, including the ability to recover unpaid obligations where necessary.

Clause 2 - Contracts for Difference

10 Do you agree that the Department should be able to make regulations in respect of the key terms and payments of the Contracts for Difference?

Yes

If no, how should this clause be amended?:

11 Do you have any further amendments that you would like to propose to this clause?

clause 2 :

Required amendments:
• Include shared ownership options within CfD terms (with a proposed 10% in community ownership)
• Define community energy organisations as eligible generators.
• Provide simplified CfD terms for community scale projects.
• Require early community engagement as a condition of CfD eligibility.

Clause 3 - Eligible generators and eligible generating stations

12 Do you agree that the Department should be able to make regulations in respect of the definition of eligible electricity generating activities?

Yes

If no, how should this clause be amended?:

Yes, subject to amendment.

CENI welcomes the requirement for the Department to define eligible electricity generating activities and eligible generators through regulations. However, the Bill should provide greater assurance that community-owned and cooperative energy projects can participate in the Renewable Electricity Price Guarantee (REPG) framework.

Without explicit recognition of community energy, there is a risk that eligibility criteria could be designed primarily around larger commercial developers, creating unintended barriers for locally owned renewable energy projects.

Required amendments:

-Explicitly define a community energy organisation as an eligible generator.
-Ensure eligibility criteria are proportionate and support community-scale generation alongside larger commercial projects.
-Require the Department to publish guidance on community energy eligibility and participation.
-Require the Department, when developing eligibility criteria, to have regard to community ownership, cooperative ownership and wider community participation in renewable energy development.

Community energy projects can make a unique contribution to Northern Ireland's renewable energy transition by combining renewable generation with local ownership, community benefit and public participation. The eligibility framework should therefore ensure that community-led projects have a clear route into the scheme and are not disadvantaged by administrative, financial or scale-related requirements designed primarily for larger operators.

The REPG should support a diverse renewable energy market in which commercial, public, cooperative and community-owned generators can all contribute to meeting Northern Ireland's decarbonisation objectives.

13 Do you have any further amendments that you would like to propose to this clause?

clause 3:

See above

Clause 4 - Counterparty

14 Do you agree that the Department should be able to make regulations in respect of the designation of a counterparty?

Yes

If no, how should this clause be amended?:

CENI agrees that the Department should have the power to designate a counterparty for the administration of Contracts for Difference. However, given the significant public interest role of the counterparty and its responsibility for managing substantial financial flows associated with the energy transition, the legislation should provide stronger governance, transparency and accountability provisions.

Recommended amendments:

Establish minimum statutory governance and accountability requirements for any designated counterparty.
Require the counterparty to operate in the public interest and be subject to appropriate Assembly oversight and scrutiny.
Require annual reporting on the operation of the CfD scheme, including impacts on consumers, communities and community energy participation.
Require public consultation before designation of a counterparty or significant changes to its governance arrangements.
Require publication of governance arrangements, performance reports and key operational decisions, subject to appropriate confidentiality protections.

15 Do you have any further amendments that you would like to propose to this clause?

clause 4:

No

Clause 5 - Allocation rounds

16 Do you agree that the Department should be able to make an allocation round for Contracts for Difference from time to time and at its discretion?

Yes

If no, how should this clause be amended?:

CENI agrees that the Department should retain flexibility regarding the timing and design of allocation rounds. However, allocation rounds should not be held solely at the Department's discretion without a framework that provides predictability, transparency and confidence for investors, communities and market participants.

Regular and predictable allocation rounds are essential to support investment, supply-chain development, project planning and community participation. Excessive uncertainty may discourage both commercial and community-led renewable energy projects and undermine confidence in the renewable electricity support framework.

Required amendments:

-Require allocation rounds to be held at regular intervals, such as annually or biennially, except where exceptional circumstances justify an alternative approach.
-Require publication of a multi-year Allocation Round Roadmap setting out anticipated timings, technologies and indicative capacity requirements.
-Require the Department to publish reasons for any delay, suspension or cancellation of an allocation round.
-Ensure allocation schemes include opportunities for community-owned and cooperative energy projects to participate.
-Require publication of allocation notices, scheme rules, eligibility criteria and award decisions.
-Establish a public Allocation Scheme Register containing key information on allocation rounds and successful projects.
-Require consultation with community energy organisations, local authorities and relevant stakeholders when developing or significantly revising allocation arrangements.
-Require reporting on the participation and outcomes of community energy projects within allocation rounds.

17 Do you agree that the Department should be obliged to publish related notices, issue terms and publish rules and thus make an allocation scheme, at its discretion?

Yes

If no, how should this clause be amended?:

The Department should be obliged to publish notices, terms and rules and to establish allocation schemes in a transparent and accountable manner. While operational flexibility is important, the process should be governed by clear principles of openness, predictability and fairness to ensure that the benefits of the Renewable Electricity Price Guarantee framework are accessible to communities as well as commercial developers.
Required amendments:
• Require allocation rounds at fixed intervals (annual or biennial).
• Publish a multi year Allocation Round Roadmap.
• Require justification for any delay or cancellation.
• Embed community energy participation and mandatory community benefit obligations.
• Require statutory publication of notices, terms and rules.

• Establish a public Allocation Scheme Register.
• Require consultation with community organisations and local authorities.

18 Do you agree that the Department should make regulations in respect of how generators are to apply and how applications are to be adjudged as successful?

Yes

If no, how should this clause be amended?:

The application and assessment process should be fair, transparent and accessible to projects of different scales and ownership models. The regulations should not be designed solely around the needs of large commercial developers but should also enable community-owned and cooperative projects to compete effectively and contribute to Northern Ireland's renewable energy transition.

19 Do you have any further amendments that you would like to propose to this clause?

clause 5:

Se previous responses

Clause 6 - Allocation scheme

20 Do you agree that the NI electricity grid system operator should determine the outcome of a Contracts for Difference allocation round?

No

If no, how should this clause be amended?:

Response to Questions 20–22
Required amendments:
• Include a dedicated community energy pathway within allocation schemes.
• Require facilitation of shared ownership.
• Publish all criteria early to support community readiness.
• Prioritise projects with strong community benefit commitments.

21 Do you agree that the allocation scheme devised by the Department and at its discretion should specify the strike price, the setting of targets including how electricity is to be generated?

If no, how should this clause be amended?:

See answer to Q20

22 Do you have any further amendments that you would like to propose to this clause?

clause 6:

See answer to Q20

Clause 7 - Agreements to modify certain standard terms

23 Do you agree that the counterparty and the generator should be able to amend the terms of the Contract for Difference contract in the circumstances specified?

Yes

If no, how should this clause be amended?:

CENI required amendments:
• Permit modifications that strengthen community benefit or shared ownership.
• Allow community organisations to request modifications.
• Require the counterparty to consider community impact.

24 Do you agree that the Department should have the power to make regulations to specify how and when the terms of the Contract for Difference contract may be modified?

Yes

If no, how should this clause be amended?:

CENI required amendments:
• Permit modifications that strengthen community benefit or shared ownership.

• Allow community organisations to request modifications.
• Require the counterparty to consider community impact.

25 Do you have any further amendments that you would like to propose to this clause?

clause 7 :

No

Clause 8 - Contracts for Difference notifications

26 Do you agree that Contracts for Difference allocations should be sent to the counterparty?

No

If no, how should this clause be amended?:

27 Do you agree with the proposed content of the notification?

No

If no, how should this clause be amended?:

CENI required amendments:
• Require notifications to include community benefit obligations.
• Require notifications to include shared ownership offers.

28 Do you agree that the Department should be able to, through regulations, vary the content and circumstances of issuing for notifications?

No

If no, how should this clause be amended?:

CENI would like to see standardised notifications with the required amendments:
• Require notifications to include community benefit obligations.
• Require notifications to include shared ownership offers.

29 Do you have any further amendments that you would like to propose to this clause?

clause 8 :

No

Clause 9 - Allocation: offer to contract on standard terms

30 Do you agree that the counterparty should be required to offer to contract with a relevant electricity generator subject to the terms of the notification?

Yes

If no, how should this clause be amended?:

31 Do you agree that the Department should be able to, through regulations, in respect of how the counterparty is to apply or complete the standard terms and in respect of timelines and failure to complete?

Yes

If no, how should this clause be amended?:

32 Do you have any further amendments that you would like to propose to this clause?

clause 9:

No additional amendments proposed beyond those already outlined in earlier clauses.

Clause 10 - Supplier levy

33 Do you agree that the Department should be able to make regulations to require electricity suppliers to pay a levy to the counterparty to cover the counterparty's costs of making payments to electricity generators under Contracts for Difference including covering losses as a result of insolvency or supplier default?

Yes

If no, how should this clause be amended?:

34 Do you agree that the Department should be able to, through regulations, allow for the exemption of certain electricity supplies from the levy?

Yes

If no, how should this clause be amended?:

35 Do you have any further amendments that you would like to propose to this clause?

clause 10:

While the levy mechanism provides an important means of funding Contracts for Difference and supporting renewable energy investment, the public benefit will depend on who is able to access the scheme. If participation is limited primarily to large commercial developers, the direct financial benefits may accrue largely to the private sector while costs are socialised across electricity consumers. The Department should therefore consider how community-owned and cooperative energy projects can access CfD support, ensuring that the economic benefits of the energy transition are retained within local communities alongside the wider public benefits of decarbonisation, energy security and price stability.

Clause 11 - Supplier levy: supplementary

36 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Clause 12 - Payments to electricity suppliers

37 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Clause 13 - Community benefit

38 Do you agree with the provisions of this clause?

No

If no, how should this clause be amended?:

No.

CENI welcomes the inclusion of community benefit within the Bill and recognises that Clause 13 represents an important acknowledgment that communities should share in the benefits arising from renewable energy development. However, CENI does not agree with the clause as currently drafted because it creates a discretionary power rather than a clear statutory requirement.

Renewable energy projects supported through the Renewable Electricity Price Guarantee will benefit from a publicly enabled support mechanism. Communities hosting this infrastructure should therefore be guaranteed a fair and consistent share of the benefits generated. The Bill should provide certainty for communities rather than leaving these arrangements entirely to future regulations.

Required Amendments

-Replace "may" with "must". The Bill should require the Department to make regulations establishing community benefit arrangements for projects receiving support under the scheme.

-Establish a minimum community benefit contribution. Community benefit payments should be set at a minimum of £5,000 per MW per annum, index linked, providing consistency, certainty and fairness across projects.

-Define Community Benefit Funds. The legislation or regulations should establish clear principles that Community Benefit Funds should be:

long-term;
predictable;
transparent;
locally accountable; and
subject to democratic decision-making.

-Create a statutory Community Benefit Register. A publicly accessible register should record:

community benefit commitments;
annual payments;
recipient organisations;
funded activities; and
compliance information.

-Require annual reporting. Generators and the counterparty should publish annual reports detailing community benefit commitments, payments made and outcomes achieved.

-Require community-led action planning. Community benefit expenditure should be informed by locally determined priorities and community-led planning processes.

-Support community energy pathways. Regulations should allow community benefit arrangements to support:

community energy development;
capacity building;
feasibility studies;
local ownership opportunities; and
shared ownership models.

-Strengthen monitoring and enforcement. The Utility Regulator should have oversight responsibilities, supported by effective compliance mechanisms, including the ability to recover unpaid obligations where necessary.

Clause 14 - Sums held by, and liabilities of, the counterparty

39 Do you agree with the provisions of this clause?

No

If no, how should this clause be amended?:

We broadly support the provisions of Clause 14 but believe additional safeguards are required to ensure transparency, public benefit and support for community participation in the energy transition.

Required amendments:

Ringfence funding for community benefit oversight and enforcement. Where resources are available, provision should be made to ensure that community benefit commitments associated with energy developments can be effectively monitored and enforced.

Support community energy capacity building. Before surplus funds are transferred to the Consolidated Fund, consideration should be given to allocating resources towards community energy development, capacity building and local ownership initiatives. This would help ensure that the benefits of the energy transition are shared more widely and that communities are enabled to participate directly in renewable energy generation.

Require transparency and annual reporting. The counterparty should publish an annual report detailing:

total funds received;
operational expenditure;
any surplus or excess funds;
amounts transferred to the Consolidated Fund; and
expenditure on community benefit oversight and community energy support.

Prioritise public benefit before redistribution. Any redistribution or transfer of surplus funds should only occur once statutory obligations, community benefit commitments and agreed community energy support measures have been adequately funded.

As communities and consumers ultimately bear many of the costs associated with energy support mechanisms, there should be a clear public benefit arising from their operation. Clause 14 should therefore ensure that, where surplus funds exist, consideration is given to supporting community benefit delivery, local ownership and community energy participation before funds are transferred elsewhere. This would help ensure that the transition to a low-carbon energy system creates lasting social and economic value within local communities, rather than delivering benefits solely through market participants.

Clause 15 - Information and advice

40 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

CENI supports the need for the Department, Utility Regulator, Counterparty and System Operator to obtain information necessary for the effective operation and oversight of the CfD regime. However, the clause focuses primarily on the collection of information and provides insufficient provisions regarding transparency, public accountability and access to information that would support community participation in the energy transition.

We therefore support the clause subject to amendment.

Required amendments:

Require publication of aggregated data on CfD outcomes, levy collection and expenditure, compliance activity and community benefit delivery.
Require information-sharing arrangements that support community energy participation, public understanding and scrutiny of the energy transition.
Require publication of all regulations, guidance, methodologies and key decisions made under these powers.
Ensure commercial confidentiality provisions are proportionate and do not unnecessarily prevent public transparency or accountability.
Require annual reporting to the Assembly Committee for the Economy on the use of these powers and the operation of the CfD regime.
Require regular public reporting on the distribution of benefits arising from the CfD scheme, including impacts on consumers and communities.
In conclusion, CENI supports the mechanisms needed to deliver renewable energy investment and operate the CfD framework. However, because consumers ultimately fund much of the system, the legislation should contain stronger provisions on transparency, accountability, community benefit, consumer protection and community energy participation.

Clause 16 - Oversight and resolution of disputes

41 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

CENI supports the principle of independent monitoring and oversight of CfD allocation rounds and agrees that mechanisms should exist to identify failures, ensure fairness and maintain confidence in the allocation process.

However, the clause should be strengthened to ensure transparency, accountability and fair opportunities for community energy participation.

Required amendments:

-Require publication of monitoring reports. All monitoring reports, findings and recommendations should be published, subject only to necessary protections for commercially sensitive information.

-Assess impacts on community energy participation. Monitoring should explicitly consider whether allocation rounds are accessible to community-owned and cooperative energy projects and identify barriers to participation.

-Require transparency in decisions to rerun or terminate allocation rounds. Where the Department exercises powers to amend, suspend, terminate or rerun an allocation round, the reasons and supporting evidence should be published.

-Provide a mechanism for stakeholder input. Community energy organisations and other affected stakeholders should be able to submit evidence or concerns to the monitor where allocation processes may disadvantage particular classes of participants.

-Require annual reporting on allocation outcomes. Reports should include information on:

project types supported;
geographic distribution of successful projects;
levels of community ownership and participation;
consumer value achieved; and
lessons learned from monitoring activities.

In conclusion, we support the CfD framework, but we want the framework monitored not only for efficiency, but also for public benefit, community participation and accountability.

Clause 17 - Further provision in connection with CfDs

42 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Yes, subject to amendment.

CENI supports the provision of regulation-making powers to enable the effective operation and administration of the Contracts for Difference scheme.

However, the Bill should provide clearer safeguards to ensure that future regulations promote transparency, accountability, consumer benefit and meaningful community participation in the energy transition.

Required amendments:

Require consideration of community energy participation. Regulations should support the participation of community-owned and cooperative renewable energy projects and seek to remove unnecessary barriers to their involvement in CfD-supported markets.

Require transparency and reporting obligations. Regulations should include requirements for public reporting on allocation outcomes, levy collection and expenditure, consumer impacts and community participation.

Require monitoring and reporting of community benefit outcomes. Where supported projects make community benefit commitments, regulations should provide for appropriate reporting and transparency mechanisms.

Ensure independent and transparent allocation processes. Any body appointed to undertake system operator functions in relation to allocation rounds should operate transparently, independently and in the public interest.

Require stakeholder consultation. Significant regulations made under this clause should be subject to consultation with relevant stakeholders, including community energy representatives and local communities affected by renewable energy development.

Provide clear accountability for the counterparty. Regulations specifying the functions of the counterparty should include appropriate governance, reporting and accountability requirements.

Clause 18 - Making of Regulations

43 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Yes, subject to amendment.

CENI welcomes the requirement for the Department to consult relevant energy-sector bodies before making regulations. Consultation is essential to ensure that the Contracts for Difference framework is effective, transparent and capable of delivering long-term public benefit.

However, the list of consultees should be expanded to recognise the role of communities and community energy organisations in the energy transition.

Required amendments:

Include community energy and community-sector representation as statutory consultees. The Department should be required to consult representative community energy organisations and other relevant civil society bodies when developing regulations under the Act.

Require public consultation on significant regulations. Consultation should not be limited to industry and regulatory bodies. Significant regulations should be subject to public consultation with sufficient time for meaningful engagement.

Publish consultation responses and departmental reasoning. The Department should publish consultation summaries explaining how stakeholder feedback has been considered and reflected in final regulations.

Strengthen scrutiny arrangements. Consideration should be given to applying affirmative resolution procedures to regulations that may significantly affect community benefit arrangements, levy mechanisms, consumer impacts or community energy participation.

Require impact assessments. Major regulations should be accompanied by assessments of their impacts on consumers, communities, community energy participation and the achievement of wider public-benefit objectives.

Clause 19 and Schedule 2 - Consequential and other provisions

44 Do you agree with the provisions of this clause and Schedule?

Yes

If no, how should this clause and schedule be amended?:

CENI supports Clause 19 in principle. The Department requires sufficient flexibility to implement the Bill effectively. However, the exercise of these powers should be accompanied by appropriate consultation, transparency and scrutiny arrangements, including engagement with community energy stakeholders and publication of relevant impact assessments and decision-making rationale.

Clause 20 - Interpretation

45 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Clause 21 - Commencement

46 Do you agree with the provisions of this clause?

Yes

If no, how should this clause be amended?:

Schedule 1 - Designation of other persons to be the counterparty

47 Do you agree with the provisions of this schedule?

Yes

If no, how should this schedule be amended?:

Additional Comments

48 Please provide any additional comments on the Bill you feel should be considered.

additional comments:

CENI strongly supports the introduction of a renewable electricity support scheme for Northern Ireland. However, the Bill should be strengthened to ensure that Contracts for Difference (CfDs) deliver not only renewable generation but also fair, transparent and consistent community benefit, alongside meaningful opportunities for community energy participation and local ownership.

As currently drafted, the Bill focuses primarily on the administration and operation of the CfD mechanism. We believe there is a significant opportunity to strengthen provisions relating to transparency, accountability and the distribution of benefits arising from renewable energy development.

CENI therefore urges the Committee to consider amendments that:

-Require community benefit arrangements for projects receiving support through the scheme (Mandatory).
-Establish a minimum and consistent community benefit contribution framework (£5,000 per MW index linked per annum)
-Create a publicly accessible Community Benefit Register.
-Require annual reporting on community benefit delivery, levy collection and expenditure, CfD outcomes and community participation.
-Create clear pathways to support community-owned and cooperative energy projects to participate in the energy transition.
-Strengthen transparency, public accountability and consumer protection throughout the Bill and associated regulations.

These measures would help ensure that the transition to a low-carbon energy system delivers social and economic benefits alongside decarbonisation objectives. They would also help align Northern Ireland with emerging best practice across these islands by ensuring that local communities share more directly in the value created by renewable energy development.

Submit your survey

49 If you provide an email address you will be sent a receipt and a link to a PDF copy of your response.

email:


Strengthening the Renewable Electricity Generation Bill

Submission by Community Energy NI to the Committee for the Economy

Community Energy, Shared Ownership and Social Value in Northern Ireland

20th October 2026

Executive Summary

The Renewable Electricity Generation Bill presents an opportunity to ensure that publicly supported renewable-energy development delivers lasting public, economic and community value, alongside increased renewable generation.

Key Message

Northern Ireland should use the Renewable Electricity Price Guarantee (REPG) to move from a model in which communities primarily host renewable infrastructure and receive discretionary benefits, towards one in which communities can participate, own assets and retain a meaningful share of the economic value created.

The Bill currently provides the Department with a power to make regulations concerning community benefit. The paper argues that this should be strengthened into a clear statutory requirement for REPG-supported projects. Community benefit, however, should not replace shared ownership: the two should be complementary elements of the REPG framework.

Experience from the Republic of Ireland and Scotland demonstrates that community benefit, shared ownership and dedicated enabling support can be incorporated into renewable-energy policy. Ireland combines mandatory Community Benefit Funds with support for community-led generation, while Scotland provides experience of shared-ownership approaches. Northern Ireland also has an established foundation of community-energy experience on which to build.

Proposed Policy Approach

REPG-supported projects should be expected to:

- provide mandatory community benefit;

- make a meaningful shared-ownership offer, with 10% as the proposed policy benchmark;
- engage communities early enough to influence project development;
- provide access to independent legal, financial and technical advice;
- demonstrate measurable social, economic and environmental value;
- support local employment, skills, supply chains and community wealth building; and
- report transparently on the benefits and outcomes delivered.

The framework should also support stand-alone community energy projects, enabling communities to develop, own and operate renewable generation, storage and other local energy assets. This will require development finance, patient capital, technical expertise, trusted intermediaries and a simplified route to market for appropriate smaller community projects.

Recommendations for the Committee / Minister

The paper recommends that the Committee support the following measures:

1. **Make community benefit mandatory** for all REPG-supported projects.
2. **Establish shared ownership as a core REPG principle**, with a minimal 10% benchmark and transparent justification for any alternative.
3. **Keep community benefit and shared ownership separate** so that neither substitute for the other.
4. **Embed social value in REPG allocation criteria**, alongside cost, generation and system value.
5. **Establish a Northern Ireland Community Energy Development Fund** covering development, feasibility, advice, capacity building and appropriate finance.
6. **Create a dedicated pathway for stand-alone community projects**, including simplified market access and development support.
7. **Require early community engagement** before key ownership, finance and development decisions are finalised.
8. **Guarantee independent advice** for communities considering ownership or investment.
9. **Require transparent reporting and annual departmental monitoring** of community, economic and social-value outcomes.
10. **Promote community wealth building**, enabling benefits to create long-term community assets, enterprises and energy-efficiency activity.

11. **Set a Northern Ireland target for the Department for the Economy community and shared ownership** of renewable generation and storage.
12. **Build accountability into regulations**, including minimum standards, monitoring and consequences for non-delivery.
13. **Review the framework after the first REPG allocation rounds** and amend it in *light of implementation experience*.

The central policy issue is not whether Northern Ireland should increase renewable generation, but how the benefits of that investment are distributed and retained, based on good practice from elsewhere.

A strengthened REPG framework can help deliver cleaner electricity while also building community wealth, local economic capacity, energy resilience, employment, skills and democratic participation.

Communities should not simply host the infrastructure of the energy transition. They should have the opportunity to own it, benefit from it and help shape it.

Introduction

Northern Ireland must increase renewable electricity generation, but the success of the energy transition should not be measured only in megawatts generated. The transition will require substantial investment, new infrastructure and long-term public support. It should therefore also deliver lasting benefits to the communities that host renewable-energy infrastructure and to the wider Northern Ireland economy.

The Renewable Electricity Generation Bill provides the legislative framework for the Renewable Electricity Price Guarantee (REPG) scheme. [1] The Bill is principally concerned with financial support for low-carbon electricity generation through Contracts for Difference. It also gives the Department for the Economy power to make regulations concerning community benefit (though this wording is vague and potentially meaningless).

The experience of the Republic of Ireland is particularly relevant. Under the Renewable Electricity Support Scheme (RESS), all supported projects are required to establish a Community Benefit Fund, with a minimum contribution of €2/MWh. These funds support local initiatives and payments to households near projects, with communities involved in decisions on how funds are used. The Republic of Ireland has also created a dedicated community-enabling framework, including financial supports, trusted intermediaries and specialist advice, recognising that communities need practical assistance if participation is to be meaningful. In its community-led RESS category, Ireland has required projects to be 100% community-owned, while the Small-Scale Renewable Electricity Support Scheme has provided a simpler route to market for community projects. [6][7][8]

The ROI experience therefore demonstrates that community benefit, community ownership and enabling support can be designed into renewable-energy support mechanisms rather than treated as optional additions. It also illustrates the value of learning from implementation: Ireland has reviewed its Community Benefit Fund arrangements following experience from the first RESS auction and updated the framework in response to stakeholder feedback. [6]

That is an important starting point, but it is not yet a sufficiently strong framework for ensuring that publicly supported renewable generation delivers public value.
This paper argues for a clear principle: ***Where public support helps make renewable generation possible or commercially viable, the resulting projects should deliver measurable and lasting public and community value.***

That principle should be reflected in the Bill, in REPG allocation rounds and in the regulations that follow. The case for doing so is not new. The Fermanagh Trust has argued for more than a decade that communities should move beyond being passive recipients of renewable development and become active participants and beneficiaries. Community Energy NI has developed this approach further by promoting community generation, energy management, purchasing and energy reduction,

alongside shared ownership. The Northern Ireland experience therefore provides an existing foundation on which stronger policy can be built.

Scotland provides a particularly relevant comparator. Its approach demonstrates that shared ownership can be accommodated through different models, including joint ventures, shared revenue and split ownership. Community Energy Scotland has subsequently argued for mandatory shared-ownership offers and a 20% community stake as a policy benchmark for new, expanding and repowering projects.
Northern Ireland should learn from that experience while developing an approach suited to its own circumstances.

The Bill should therefore be strengthened around the following principles:

- Make community benefit mandatory for REPG-supported projects rather than leaving it to a discretionary power.
- Require a meaningful shared-ownership offer to communities of a minimum of 10% as the standard policy benchmark while allowing proportionate departures where a different structure is demonstrably necessary.
- Keep community benefit and shared ownership distinct, so that one cannot simply substitute for the other.
- Embed social value in REPG allocation, alongside price, generation capacity, deliverability and system value.
- Establish a Northern Ireland Community Energy Development Fund to address the finance, technical and governance barriers that can prevent communities from participating.
- Require early community engagement, before key development and financial decisions have been settled.
- Provide independent advice to communities considering investment or ownership.
- Require transparent monitoring and reporting** of community, economic and social-value outcomes.
- Promote community wealth building, allowing community benefit to support long-term assets, enterprises and energy-efficiency activity rather than short-term expenditure.
- Establish a clear Northern Ireland target for the Department with specific quantitative and qualitative targets for growing community energy initiatives and shared ownership models, supported by annual reporting.
  These proposals are not intended to prevent renewable development or create unnecessary burdens for developers. Their purpose is to improve the quality and durability of development by ensuring that communities have a meaningful stake in the transition.

The central policy choice is therefore not whether Northern Ireland should develop renewable generation. It is what kind of renewable-energy system Northern Ireland wants to build. A system in which communities simply host infrastructure and receive discretionary benefits is possible. A system in which renewable investment also builds community wealth, local economic capacity, energy resilience and democratic participation is possible too. The second approach should be the policy objective.

1. The Opportunity Presented by the Bill

The Renewable Electricity Generation Bill is an important opportunity to shape Northern Ireland's renewable-energy future.

The Bill gives the Department for the Economy powers to establish financial assistance for low-carbon electricity generation through Contracts for Difference. It provides for allocation rounds, eligibility requirements, financial arrangements and other matters necessary to establish the support mechanism. Importantly, section 13 gives the Department power to make regulations requiring generators receiving a CfD to make specified payments to specified persons as community benefit.

Republic of Ireland experience provides a useful comparator for how community value can be embedded in a renewable-support scheme. Ireland's RESS requires every supported project to establish a Community Benefit Fund with a minimum contribution of €2/MWh. The funds can support local infrastructure, energy upgrades, education and other locally determined priorities, while households close to projects can also receive payments. The Irish Government has subsequently developed a Community Benefit Fund rulebook and revised scheme arrangements in response to experience from the first auction. [6]

Northern Ireland should not simply reproduce the Irish model. The more useful lesson is that community benefit, community ownership and practical support can be built into the design of a renewable-support scheme, with the framework adjusted as experience develops.

The Republic of Ireland has also gone beyond community benefit. Its policy framework has supported community-led renewable generation through dedicated enabling measures, including grants and soft loans, trusted intermediaries, specialist advisers and information resources. For community-led projects in the RESS community category, the Government stated that projects must be 100% community owned so that communities retain the benefits associated with generating their own electricity. A later Small-Scale Renewable Electricity Support Scheme (SRESS) provided an easier route to market for community projects than the competitive RESS auction, including eligibility for certain 100%-community-owned projects that had struggled to meet RESS milestones. [7][8]

The Bill therefore already recognises that publicly supported renewable generation can and should have a community dimension. The issue is whether that principle is sufficiently embedded in the legislation.

At present, the community-benefit provision unclear at best and as worded is enabling rather than mandatory: the Department **may** make regulations requiring community-benefit payments. As currently worded, there is clearly a lack of clarity what this would actually mean. [2] This leaves open the possibility of a support mechanism in which substantial public support is provided to renewable projects while community

participation and long-term community value remain limited. That would be a missed opportunity.

REPG should not be viewed simply as another market intervention. It is intended to provide long-term support for renewable generation because that generation delivers wider public benefits, including decarbonisation, energy security, price stability and economic development. If public support is justified partly by those wider benefits, it is reasonable that the design of the support mechanism should consider who receives the economic and social value created by it.

The Bill should therefore establish a clear policy principle:

REPG-supported projects should demonstrate public, economic and community value in addition to delivering renewable electricity.

This is not an argument against renewable development. It is an argument for better-designed development.

2. Building on Northern Ireland's Community Energy Experience

The case for community energy in Northern Ireland is not new.

The Fermanagh Trust's 2012 Maximising Community Outcomes from Wind Energy Developments examined community benefit, community ownership and better approaches to engagement with renewable-energy developments. Its evidence to the Assembly in 2014 identified a persistent weakness in conventional approaches: communities were too often engaged primarily in the context of planning applications rather than treated as partners in the development of major infrastructure.
The lesson is important. Engagement that begins only when a project has largely been designed is unlikely to give communities meaningful influence over the choices that matter most.

Community Energy NI has developed a broader conception of community participation. Communities should not merely receive payments from renewable development; they should have the opportunity to **generate, manage, purchase and reduce energy**. This shifts the emphasis from compensation or benefit distribution towards participation in the energy system itself. That distinction matters.

A traditional community-benefit model can provide valuable resources for local projects, services and priorities. However, it does not necessarily alter the underlying ownership relationship. The developer owns the asset and the community receives a payment.

Shared ownership goes further. It can give communities a direct economic stake in the project, creating opportunities for long-term income, asset ownership, expertise, influence and decision-making.
Northern Ireland should build on the experience and expertise already developed here and move towards a model in which communities can participate economically as well as benefit socially.

3. Community Benefit and Shared Ownership

Community benefit and shared ownership should be treated as **complementary, not interchangeable**.
Community benefit can support locally determined priorities such as community facilities, energy efficiency, local services, youth provision, transport or other community projects.

Shared ownership provides something different: an economic stake in the renewable-energy project itself.
Potential models include:

- joint-venture ownership;
- shared-revenue arrangements; and
- split ownership of physical assets.

A community organisation might, for example, acquire a minority equity stake through an appropriate project structure, participate in future project revenues, or own a defined part of the generating asset. The appropriate model will depend on the project.

The policy principle should nevertheless be consistent:
Where public support helps make renewable development possible or commercially viable, local communities should have a meaningful opportunity to participate in ownership and in the economic returns generated.

A community-benefit payment should not be presented as a substitute for ownership. Equally, an investment opportunity should not be used to eliminate a project's wider community-benefit obligations.
The distinction is fundamental:

Community benefit = value provided to the community.
Shared ownership = the community becoming an economic partner in the project.

Both should form part of a stronger REPG framework.

4. Learning from the Republic of Ireland

The Republic of Ireland offers a close and practical comparator because its renewable-support framework combines competitive auctions with explicit community-benefit and community-energy measures.

Under RESS, all supported projects must establish a Community Benefit Fund with a minimum contribution of €2/MWh of electricity generated. The funds are intended to support the wider environmental, social, economic and cultural wellbeing of local communities. The Irish framework also provides for household payments close to certain projects and requires a proportion of fund expenditure to support sustainable-development objectives. [6]

This has complemented this mandatory benefit model with measures designed to make community ownership possible in practice. Its community-enabling framework has included financial support, trusted intermediaries, specialist advice and accessible information. The community category of RESS was designed around 100% community ownership, while SRESS has provided a simpler route to market for community projects than the competitive RESS process. [7][8]

This experience reinforces three points relevant to Northern Ireland. First, community benefit can be a normal condition of receiving public renewable support. Second, ownership ambitions need practical finance, expertise and institutional support. Third, policy should be capable of learning from implementation and adjusting the framework when experience identifies problems. The Republic of Ireland therefore provides a useful model of an enabling architecture, while Northern Ireland should determine the precise design that best fits its own legal, economic and community-energy context.

5. Learning from Scotland

Scotland provides Northern Ireland with a particularly relevant comparator. Scottish Government guidance has encouraged shared ownership to be considered, explored and offered as standard on new renewable-energy projects, including extensions and repowering. The approach recognises that shared ownership can generate income, build community capacity, strengthen relationships between developers and communities, and give communities greater control over local energy generation.

The Scottish experience also demonstrates that there is no single model of shared ownership. Communities differ in financial capacity, governance arrangements and ambitions. Flexibility is therefore necessary.

But flexibility must not become an excuse for weak offers.

Community Energy Scotland has argued for mandatory offers of shared ownership and proposed at least 20% shared ownership for new, expanding and repowering projects,

supported by government-backed finance. It has also emphasised that meaningful shared ownership should involve more than a nominal financial opportunity: communities should have appropriate governance rights and a meaningful role in decision-making.

Northern Ireland should adopt that principle.

A credible shared-ownership offer should include:

- access to appropriate finance;
- independent advice;
- transparent financial and technical information;
- proportionate risk;
- a genuine financial return;
- appropriate governance rights;
- long-term participation; and
- a clear role in decisions concerning repowering, refinancing, sale and end-of-life arrangements.

The aim should be a genuine partnership, rather than an investment opportunity that exists only in principle.

6. Supporting Stand-Alone Community Energy Projects

Shared ownership is only one route to community participation. Northern Ireland should also create a framework that encourages and facilitates stand-alone community energy projects: projects initiated, developed, owned and controlled by communities themselves.

This distinction is important. Shared ownership gives a community the opportunity to participate in a project that has been initiated or led by another developer. A stand-alone community project gives the community the opportunity to become the developer and long-term owner of the asset. Both models should be supported, but they address different ambitions and should not be treated as alternatives from which Government must choose.

The Republic of Ireland provides a useful example. Its renewable-energy policy has combined investment opportunities and community-benefit requirements for commercial projects with a separate enabling framework designed to encourage a meaningful community electricity-generation sector. The framework has included grants and soft loans, trusted intermediaries, specialist legal and financial advice, practical guidance and a central point of contact. [9]

The Irish government has also recognised that community-led projects can face difficulties in competing with commercial developers in auction processes. The Small-Scale Renewable Electricity Support Scheme (SRESS) was designed to provide a simpler route to market for community projects than the competitive RESS auction process. Current SRESS arrangements include export tariffs for certain community

projects and dedicated SEAI supports, including free specialist technical advice throughout project development. [10][11]

Northern Ireland should adopt the same broad principle: a Renewable Electricity Price

Guarantee should not only facilitate community participation in developer-led projects; it should also help communities bring forward projects of their own.
A Northern Ireland framework for stand-alone community energy should therefore include:

- a clear route for eligible community organisations to access REPG or an appropriate dedicated support mechanism;
- a proportionate, non-auction or otherwise simplified route to market for smaller community projects where competitive processes create unnecessary barriers;
development funding for feasibility studies, site assessment, planning, grid applications and professional advice;
- access to patient capital, grants, soft loans or loan guarantees;
- technical, legal and financial support through an independent trusted-adviser network;
a single point of contact within Government or a designated delivery body;
support for renewable generation, electricity storage and other appropriate community energy assets; and
- a framework that enables communities to retain long-term ownership and reinvest revenues in local priorities.

The objective should be to remove the structural disadvantages that often prevent communities from moving from an initial idea to an operational energy asset. Communities should not have to compete on identical terms with large commercial developers while lacking comparable access to capital, technical expertise and development capacity.

A stronger legislative framework would therefore recognise two equally legitimate forms of community participation: community partnership with commercial developers through shared ownership, and independent community ownership through stand-alone projects.

The policy goal should not be to prescribe which model a community must choose. It should be to ensure that both routes are available and that communities have the practical support required to pursue the model that best reflects their ambitions and local circumstances.

7. Social Value: From Procurement Policy to Energy Policy

There is a strong opportunity to connect community energy with the Northern Ireland's Executive wider emphasis on social value.

The Northern Ireland Social Value Strategy defines social value in terms of wider financial and non-financial impacts on the wellbeing of individuals, communities and the environment, including community benefits and wealth building, jobs and skills, sustainable supply chains and climate action. [3]

Northern Ireland's procurement policy provides a useful precedent: the Executive's social-value policy requires applicable tenders to include a minimum of 10% of total award criteria for social value. [4] The underlying principle is that public expenditure should generate wider societal benefits rather than focusing solely on the immediate transaction. The same principle should and must inform REPG.

REPG may support major investment over the lifetime of renewable projects. Decisions made through the scheme will influence not only how much renewable electricity is generated, but also who owns assets, where income flows, who obtains employment and skills opportunities, and whether communities develop long-term economic resilience.

Social value should therefore be designed into REPG from the outset.

This does not mean turning REPG into a procurement exercise. It means recognising that the allocation of public support should take account of measurable social, economic and environmental outcomes alongside price and generation capacity.

8. What Should Social Value Mean for Renewable Energy?

A Northern Ireland REPG social-value framework should be clear, measurable and proportionate. It should focus on outcomes that renewable projects can realistically influence.

8.1 Community ownership

Projects should be rewarded for meaningful community ownership or shared ownership.

Ownership should carry appropriate financial and governance rights and should be additional to community-benefit arrangements.

8.2 Local economic value

Projects should demonstrate how expenditure can benefit the Northern Ireland economy through local contractors, suppliers and professional services where competitive and appropriate.

Opportunities should be accessible, where practicable, to SMEs, social enterprises and community organisations.

8.3 Jobs and skills

Projects should provide measurable opportunities for local employment, apprenticeships, training and skills development.

Where possible, this should extend beyond the construction phase and contribute to a sustainable local skills base.

8.4 Community wealth building

Community benefit should be capable of supporting locally determined priorities and the creation of long-term community assets.

The objective should be to convert renewable investment into lasting local economic capacity rather than limiting benefits to short-term expenditure.

8.5 Energy affordability and fuel-poverty reduction

Community benefit should be capable of supporting energy-efficiency measures and activities that reduce energy demand.

Community energy should not be understood solely as electricity generation. The broader objective is to enable communities to reduce, manage, generate and purchase energy more effectively.

8.6 Environmental and climate value

Projects should demonstrate their contribution to decarbonisation, biodiversity, energy efficiency and wider environmental sustainability.

Taken together, these dimensions provide a more complete account of the value generated by renewable investment.

9. A Stronger Statutory Model for Community Benefit

Section 13 provides a useful starting point, but it should be strengthened in three respects.

First: move from vague discretion to obligation

The Bill currently provides that the Department **may** make regulations requiring community-benefit payments.

For REPG-supported projects, this should become a clear statutory requirement.

The purpose is not to prescribe one identical model for every project. Rather, the legislation should establish the principle that public support carries a corresponding obligation to deliver community value.

Second: prioritise long-term, locally controlled value

Community benefit should not be limited to payments to individuals living close to a generating station.

The framework should recognise democratically accountable community organisations as important recipients and managers of community benefit, while allowing locally appropriate arrangements.

Third: establish minimum standards

Community-benefit arrangements should be:

- additional to statutory planning obligations;
- transparent;
- independently monitored;

- locally governed;
- long-term;
- proportionate to the scale and value of the development; and
- publicly reported.

Community benefit should not be framed simply as compensation for development impacts. It should represent a share of the wider value created by the energy transition.

10. A Statutory Offer of Shared Ownership

The most significant strengthening of the Bill would be to establish a statutory obligation for REPG-supported projects to make eligible communities a meaningful shared-ownership offer.
Every REPG-supported project should be expected to:

- identify the relevant community or communities;
- engage with them at an early stage;
- provide sufficient financial and technical information to allow an informed decision;
- offer a meaningful opportunity for community investment;
- provide sufficient time for the community to consider the proposal;
- provide access to independent advice;
- facilitate appropriate finance; and
- document and report the final ownership arrangement.

A minimum 10% shared-ownership offer should be established as the standard policy benchmark, reflecting the direction of travel proposed by Community Energy Scotland.

The benchmark should be accompanied by a sensible safeguard: where a project cannot reasonably offer 10%, the developer should be required to explain why and demonstrate that the alternative offer remains meaningful, credible and proportionate. This approach combines ambition with flexibility. It avoids imposing an artificial structure on every project while preventing vague or nominal offers from being presented as community ownership.

11. Financing Community Participation

A statutory right to participate will mean little if communities cannot afford to exercise it.

One of the most significant barriers to shared ownership is access to finance and expertise. A community may be willing to acquire a stake but lack the capital, technical knowledge or professional support required at the point when an investment decision must be made.

Government therefore has a legitimate enabling role. The REPG framework should be accompanied by a Northern Ireland Community Energy Development Fund.

The Fund could provide:

- development grants;
- feasibility funding;
- independent legal and financial advice;
- technical expertise;
- community capacity building;
- project-development finance; and
- where appropriate, loan guarantees or patient capital.

This would help convert shared ownership from a theoretical right into a realistic opportunity.

It would also help address an important equity issue. Without support, the communities best placed to participate may be those that already possess financial resources and professional expertise. A properly designed fund can help ensure that participation is available to communities where social and economic need is greatest.

12. Early Engagement Must Become the Norm

The Fermanagh Trust's earlier evidence identified a fundamental problem with conventional renewable-energy engagement: communities could be approached primarily when a planning application was already being prepared.
That model should not be replicated under REPG.

Engagement should begin early enough for communities to influence the project rather than merely respond to it. Developers should therefore be required to identify and engage with relevant communities during the development of the REPG application, before key decisions about ownership, finance and community benefit have been finalised.

Early engagement should cover: the proposed development; potential ownership models; community-benefit arrangements; likely financial returns; local employment and supply-chain opportunities; energy-efficiency opportunities; community priorities; and governance arrangements.

The aim should be partnership rather than consultation. The test should be practical: could the community's views still influence the project? If not, engagement has begun too late.

13. REPG Allocation Should Reward Social Value

The Bill provides scope for the Department to establish allocation schemes and criteria. That creates an opportunity to embed social value directly into the REPG allocation mechanism.

REPG allocation should consider the conventional characteristics of a successful project, including: price; generation capacity; technology; deliverability; and system value.
It should also consider measurable wider outcomes, including:
- community ownership;
- community benefit;
- local economic value;
- jobs and skills;
- local supply chains;
- energy affordability and efficiency;
- community wealth building; and
- environmental outcomes.

The aim should not be to replace value for money with a subjective social-value test. Rather, it should ensure that value for money is understood more broadly when public support is being allocated.
This would also align REPG with the wider direction of Northern Ireland public policy, which already recognises that public expenditure can and should deliver wider benefits to society, the economy and the environment.

14. Community Energy Can Strengthen Renewable Development

A legitimate concern is that stronger community requirements could make projects more complicated or discourage investment. This concern should be addressed directly.

The objective should be to create a framework that is clear, predictable and proportionate. Developers should know from the outset what is expected of them, while communities should know what rights and support are available.

The Scottish experience indicates that community participation can contribute to stronger relationships, community capacity and public support for renewable development. It can therefore be viewed not simply as an additional obligation but as part of the infrastructure needed to deliver the energy transition successfully.
Northern Ireland needs renewable generation.

But it also needs public confidence in renewable generation.

Those objectives are not contradictory. A project that gives communities a meaningful economic stake can strengthen the sense that renewable infrastructure is being developed with communities rather than simply for them.

A stronger community framework can therefore support, rather than undermine, the long-term legitimacy of renewable development.

15. Recommendations for Amendment and Implementation

The Committee for the Economy should recommend that the Bill and subsequent regulations establish a clear and enforceable framework covering the following points.

Recommendation 1 — Make community benefit mandatory

Amend section 13 so that REPG-supported projects are required to provide community benefit in accordance with regulations made by the Department.

Recommendation 2 — Establish shared ownership as a core REPG principle

Require developers seeking REPG support to make a meaningful shared-ownership offer to eligible communities.

10% should be the standard policy benchmark. Any departure should be justified, transparent and subject to the requirement to provide a credible alternative.

Recommendation 3 — Keep community benefit and shared ownership separate

The regulations should expressly provide that shared ownership does not replace community benefit, and community benefit does not replace shared ownership.

Recommendation 4 — Embed social value in allocation rounds

REPG allocation criteria should include measurable social, economic and environmental outcomes alongside cost, generation and system considerations.

Recommendation 5 — Establish a Northern Ireland Community Energy Development Fund

Government should establish a dedicated fund to help communities assess, develop, finance and participate in renewable-energy projects.

Recommendation 6 — Support stand-alone community energy projects

The Bill and the REPG framework should expressly encourage and facilitate community-led renewable-energy projects that are initiated, developed and owned by communities themselves, alongside shared-ownership opportunities in commercial projects.

Government should establish a practical support pathway, drawing on relevant lessons from the Republic of Ireland, including simplified access to market where appropriate, development funding, patient finance, independent technical and financial advice, a trusted intermediary network and a clear single point of contact. The objective should be to enable communities to develop and retain long-term ownership of renewable generation, storage and other suitable local energy assets. [9][10][11]

Recommendation 7 — Require early community engagement

Developers should engage with relevant communities before key project decisions are finalised and sufficiently early for community participation to influence the project.

Recommendation 8 — Guarantee independent advice

Communities considering investment should have access to independent legal, financial and technical advice.

Recommendation 9 — Require transparent reporting

Every REPG-supported project should publish, in a consistent format, information on: community-benefit payments; community ownership; local employment; skills and apprenticeships; local supply-chain expenditure; energy-efficiency activity; and wider social-value outcomes.

The Department should publish an annual REPG report bringing these outcomes together so that the effectiveness of the framework can be assessed over time.

Recommendation 10 — Promote community wealth building

Community-benefit funds should be capable of supporting long-term community assets, enterprises, energy-efficiency programmes and other activities that build local wealth, rather than being restricted to short-term expenditure.

Recommendation 11 — Establish a Northern Ireland community-energy target

The Executive should establish a clear target for community and shared ownership of renewable generation and storage, supported by annual reporting on progress.

Recommendation 12 — Build accountability into the regulations

The Department should establish clear minimum standards, monitoring arrangements and consequences where REPG-supported projects fail to deliver commitments on community benefit, shared ownership or agreed social-value outcomes.

Recommendation 13 — Review the framework after implementation

The Department should undertake a formal review after the first REPG allocation rounds, assessing participation, community outcomes, developer experience and the effectiveness of the finance and support arrangements. The framework should then be adjusted where necessary.

16. Conclusion

The Renewable Electricity Generation Bill is currently at Committee Stage in the Northern Ireland Assembly, following completion of Second Stage on 8 September 2026. The Economy Committee has launched a call for evidence, with submissions invited by 21 October 2026. [5]

The central question is not whether Northern Ireland should increase renewable generation. It must. The question is what kind of renewable-energy system Northern Ireland wants to build.

One model treats renewable projects principally as commercial assets, with communities receiving some limited benefits where developers or Government consider appropriate.
Another treats renewable investment as an opportunity to build community wealth, local economic capacity, energy resilience and democratic participation.

The second approach is more ambitious, but it is also more consistent with the principles already present in Northern Ireland's community-energy and social-value policy landscape.

The Fermanagh Trust's work has demonstrated for many years that communities have the capacity and desire to play a greater role in the energy transition. Community Energy NI has developed that argument further, promoting community generation, management, purchasing and reduction of energy and advocating shared ownership as a route towards genuine participation.

The Scottish experience shows that these principles can be translated into practical policy, including formal approaches to shared ownership and community benefit. Northern Ireland now has the opportunity to learn from that experience and develop a strong framework of its own.

The Republic of Ireland provides a further practical example: mandatory Community Benefit Funds, dedicated enabling supports for community-led generation, and specific routes for community ownership show that community participation can be built directly into the architecture of renewable support. [6][7][8]

The REPG framework should therefore make community benefit, shared ownership and social value integral to the allocation of public support. That means moving:
From discretionary community benefit to a clear statutory requirement;
From consultation to early partnership;
From passive benefit to meaningful ownership;
From short-term expenditure to community wealth building;
From an unfunded right to participation to properly supported participation; and
From a narrow focus on generation and price to a broader understanding of public value.

This is not about placing unnecessary burdens on renewable developers. It is about establishing clear expectations from the outset and ensuring that renewable development delivers maximum value for Northern Ireland.

A stronger framework should also recognise that communities do not have to participate only through projects initiated by others. Northern Ireland should enable communities to develop renewable generation and storage projects in their own right, retaining ownership and reinvesting the resulting value locally. The Republic of Ireland's Community Enabling Framework and its simplified SRESS route for community projects provide useful lessons in how policy can help overcome the financial, technical and procedural barriers that community-led projects face. [9][10][11]

The potential prize is significant: cleaner electricity, greater energy security, investment in communities, new employment and skills, stronger local economies, improved energy efficiency, community-owned assets and a more resilient society.
Most importantly, a stronger framework can change the relationship between communities and the energy system.

Communities should not simply host the infrastructure of the energy transition.
They should have the opportunity to own it, benefit from it and help shape it.
That should be one of the defining principles of the Renewable Electricity Generation Bill.

With the right government support in this legislation, the Credit Union movement here offers a perfect template for community energy. Both rely on local trust, member ownership and social purpose. Proper funding, streamlined regulation and grid access could transform community energy into a similar grassroots powerhouse, keeping wealth and power local. With the added benefit of changing the conversation and supports for addressing fuel poverty from the grassroots up!

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[11] Government of Ireland, Minister Ryan announces launch of the second phase of the Small-Scale Renewable Electricity Support Scheme (SRESS), explaining its objective of providing an easier route to market for community projects than the competitive RESS auction process.

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