

Response ID

Submitted to Utility Regulator (Support for Decarbonisation Preparation) Bill
Submitted on 2026-07-01 16:55:45

Introduction

1 What is your name?

name:

2 What is your email address?

email address:

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:

RenewableNI

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 but with my personal information and any content that could be used to identify me redacted.

Utility Regulator (Support for Decarbonisation Preparation) Bill

Clause 1 (1)

6 Does this part of Clause 1 give the Utility Regulator sufficient power and/or responsibility in order to help decarbonise the energy sector in Northern Ireland?

No

If no, what powers / responsibilities should the Bill confer on the Utility Regulator in order to support decarbonisation, beyond the provision of advice?:

RenewableNI welcomes Clause 1 and supports the objective of providing the Utility Regulator with a clear statutory basis to advise and assist the Department for the Economy on energy decarbonisation policy.

However, while RenewableNI considers this to be a positive and necessary step, we only believe it is partially sufficient to support the decarbonisation of Northern Ireland's energy sector. The clause strengthens the Utility Regulator's advisory role, but it is unlikely on its own to provide the powers or responsibilities required to fully support the energy transition. Decarbonisation will require timely decisions relating to network investment, renewable generation connections, system flexibility, energy storage, market reform and strategic infrastructure development.

RenewableNI also notes that delivery of Northern Ireland's Climate Change Act objectives extends beyond the remit of the Department for the Economy alone. The Act places responsibilities across government, and successful decarbonisation of the energy sector will require coordinated action by multiple departments and public bodies, including those responsible for infrastructure, planning and environmental policy. While Clause 1 strengthens the Utility Regulator's role in supporting policy development, delivering climate objectives will ultimately require a wider, joined-up approach across government.

RenewableNI therefore believes there is a strong case for considering whether future reforms should more explicitly align the Utility Regulator's wider statutory framework with Northern Ireland's climate and energy objectives, alongside its existing responsibilities relating to consumers, affordability and security of supply.

Clause 1 (2)

7 Should the Utility Regulator's support for decarbonisation be restricted to the provision of advice to the Department for the Economy?

No

If no, who else should the Utility Regulator be able to provide decarbonisation advice to?:

While RenewableNI supports the proposed power for the Utility Regulator to provide advice, information and assistance to the Department for the Economy, we do not believe support for decarbonisation should be restricted solely to engagement with a single department.

Delivery of Northern Ireland's climate and energy objectives requires coordinated action across government departments and public bodies responsible for planning, infrastructure, transport, environmental regulation and local development. This is recognised within the Climate Change Act (Northern Ireland) 2022, which places obligations across Northern Ireland departments to exercise their functions, as far as possible, in a manner consistent with achieving the targets of the Act and associated carbon budgets. The Northern Ireland Energy Strategy similarly recognises that achieving net zero carbon and affordable energy requires coordinated action across multiple sectors and policy areas.

A successful energy transition will therefore depend upon joined-up decision-making across all organisations with a role in delivering Climate Change Act objectives.

RenewableNI therefore believes there is merit in considering whether the Utility Regulator's advisory and support functions could be applied more broadly across government departments and public authorities involved in delivering climate and energy objectives. This would help ensure that policy development, infrastructure planning and regulatory decision-making are aligned towards common goals and reduce the risk of fragmented or conflicting approaches. Delivery of a decarbonised, secure and affordable energy system requires a whole-of-government approach, and the regulatory framework should support that objective.

Clause 1 (3)

8 Do you support this aspect of Clause 1?

Yes

If no, please explain in the text box below.:

RenewableNI supports this aspect of Clause 1. Clear definitions improve legal certainty, transparency and consistency and help ensure that the powers contained within the Bill are interpreted and applied effectively.

Clause 2

9 Should the relevant provisions be commenced immediately after Royal Assent?

Yes

If no, what conditions or restrictions might be placed on commencement?:

RenewableNI supports commencement of the relevant provisions immediately following Royal Assent.

The Bill is intended to provide the Utility Regulator with a clear statutory basis to support development of decarbonisation policy. Given the scale and urgency of the challenge involved in delivering Northern Ireland's Climate Change Act and Energy Strategy objectives, there is no benefit in delaying implementation of these powers.

Additional Information/Comments

10 Please provide information on any other potential amendments that you feel would enhance the Bill and the rationale for those.

Additional information or comments.:

RenewableNI believes that the transition to a decarbonised energy system must be considered through a medium- to long-term lens.

While investment in electricity networks, system flexibility, energy storage and enabling infrastructure may have implications for consumer bills in the short term, these investments are necessary to deliver lower-cost renewable electricity, improved energy security and reduced exposure to international fossil fuel and commodity price volatility over time.

Regulatory frameworks should therefore seek to protect the interests of both current and future consumers. While consumers should be protected from unnecessary costs, they should also be protected from the long-term consequences of under-investment in the infrastructure required to deliver a secure, affordable and decarbonised electricity system.

RenewableNI also believes that regulatory frameworks should support evidence-based, proportionate and timely decision-making. An overly cautious approach may avoid short-term costs but can also delay the investments required to deliver long-term affordability and decarbonisation.

Proposed Additions and Amendments

11 Please provide information on any potential amendments that you feel would enhance the Bill and the rationale for those.

Information on any potential amendments:

RenewableNI supports the Bill but believes a number of amendments could enhance its effectiveness.

First, consideration should be given to extending the Utility Regulator's advisory and support functions beyond the Department for the Economy. Delivery of Northern Ireland's climate and energy objectives requires coordinated action across multiple departments and public bodies, including those responsible for planning, infrastructure, transport and environmental regulation. Extending these functions would help support a more joined-up approach to decarbonisation.

Secondly, consideration should be given to whether the Utility Regulator's wider statutory framework should more explicitly reflect Northern Ireland's climate and decarbonisation objectives alongside existing duties relating to consumers, affordability and security of supply. Neighbouring jurisdictions have already evolved their regulatory frameworks in this direction. In Great Britain, regulatory duties have been amended to make explicit reference to net zero and the interests of current and future consumers. In Ireland, climate legislation places duties on relevant public bodies to have regard to climate objectives when carrying out their functions.

Finally, RenewableNI believes that future infrastructure policy should be guided by a strategic assessment of what is required to decarbonise Northern Ireland's electricity system most effectively. Additional interconnection may have a role to play in the future, but it should not be prioritised ahead of the critical infrastructure required to maximise indigenous renewable generation and strengthen the electricity network on the island of Ireland.

Priority should be given to infrastructure that facilitates renewable deployment, reduces reliance on imported fossil fuels, supports long-term energy security and price stability. Investment in the electricity network and associated infrastructure is therefore a prerequisite to achieving greater energy independence and price stability.

RenewableNI supports consideration of future interconnection opportunities where they can deliver benefits for consumers and system resilience. However, future interconnection should complement, rather than substitute for, the development of indigenous renewable resources and the infrastructure required to connect them. A strategic and correctly sequenced approach is required to ensure that infrastructure investment supports decarbonisation and delivers the greatest long-term value for consumers and the wider economy.

Almost done...

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