



elmhurst
energy

Date: 29/06/2021

Elmhurst Energy's response to:

Energy Strategy for Northern
Ireland

Prepared for: Department for the Economy



1. Introduction

Elmhurst Energy are pleased that the Department for the Economy in Northern Ireland are seeking a Consultation on a new 'Energy Strategy for Northern Ireland' and as such we are delighted to respond to each question in turn.

The Consultation is wide ranging and asked 79 questions and we have answered them all below. We hope you find the responses considered and useful for taking a new Energy Strategy forward for Northern Ireland in a progressive manner.

2. Executive Summary

The headlines of our response are;

- Medium-long term plan
- No more stop-start policies
- Joined up policies and regulations
- Build upon existing professionals and methodologies to improve all NI buildings
- Use Asset, Occupation and Metered (in-use) assessments
- Display all 3 metrics on EPCs – carbon emissions (CO₂), cost (£) and energy (kWh)

3. Questions and Answers

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

Yes, but it is vital to have challenging milestones through the years to ensure a smooth transition. By utilising the milestones, it may well be possible to achieve the goal sooner, especially if NI incentivise early adopters and encourage people to make changes more quickly, it is also important that NI are serious about enforcement to ensure that those who do not meet the deadlines are penalised accordingly. It is our experience that it is vital to have a medium/long term plan, and to not engage with 'stop-start' policies/regulations which does not work for any stakeholders. To gain confidence by all the goals they should be clear and transparent, measurable and achievable, thus all peoples and industry will engage and invest in ensuring the goals are met.



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

Yes, this seems sensible, although in some cases the move towards zero carbon fuels may mean more expensive technologies and supply costs, so there must be proposals in place to ensure that the unintended consequence such as placing more people into ‘fuel poverty’ is not the outcome.

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

Yes but again, the policies and regulations that come must be joined up and not be disjointed and individualistic, as this will be unhelpful and counterproductive.

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

This seems to cover the requirements to deliver this successfully.

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

- a) Carbon emissions from energy-related sectors**
- b) Jobs and turnover in the low carbon and renewable energy economy**
- c) Domestic energy costs relative to household income**
- d) Business energy purchases relative to business turnover**
- e) Households in fuel poverty**
- f) Relative electricity & gas prices**

The KPIs listed seem sensible, but noted that buildings were not being measured using the national calculation methodologies e.g. RdSAP, SAP and SBEM; this is a very easy KPI to utilise that already exists to help measure success in reducing energy demand, carbon and running costs across all Northern Ireland's buildings. It is vital that NI build upon the methodologies and professionals already practising to ensure that NI Buildings are improved over time.



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

No strong opinion

Placing You at the Heart of our Energy Future

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

- a) Domestic vulnerable consumers**
- b) Other domestic consumers**
- c) Small businesses**
- d) Larger businesses**

We agree with the groups. However publically owned infrastructure must lead the way. Government must show leadership in this space and for example all publically owned buildings must aim to be carbon neutral and have plans in place to show how to do it.

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

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

We agree, we must ensure that any changes they decide to make to their buildings occur in a quality assured way, building upon the Each Home Counts review and PAS2035 documents and frameworks created. These all sort to put the consumer at the heart of energy efficiency measures.



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

We agree that it is vital that consumers get impartial independent advice so that they make good decisions. The roll of a one stop shop is in essence a good idea, but it must be caveated that no one organisation will ever be able to answer everything; the concept of an independent advice provider is excellent that then pushes people towards the PAS2035 framework for quality assured delivery would work. But it is vital that policies and incentives change, to go towards the advice and giving people the information they need to make good decision on how they operate the building in which they live or work in. For too long the 'money' has been given to the installers, the work of the EHC review, stated 27 recommendations. These are still 100% correct, firstly understand the asset (the building), understand the occupants within it, ask what their goals are e.g. cheaper bills, warmer home, less carbon etc before coming up with a short and medium term plan to deliver the goals. The funding of all this must come first before installs occur, to ensure that the right measures go into the right buildings in the right order.

The setup of a one stop shop must embrace free markets and ensure that they do not attempt to do it all; but that they embrace and work with the existing quality assured regimes that already operate e.g. accredited energy assessors. It would be massive mistake to rip it all up and start again. It is vital to build upon the great work already in place, bringing the parts of the jigsaw together is essential, good independent advice, good assessment of the building and occupants behaviour in it, a plan to meet the goals and good quality installs; followed by monitoring of outcomes to ensure that the goals are being met.

If this is to exist, it is essential that polices, guidance and regulations build upon this, that they work together and that they do not keep stopping and starting.

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

As per answer to Q9. As long as the solution works in partnership with other quality assured delivery mechanisms, and they do not try and do everything under their own banner, as this would be anti-competitive and would suffer from scalability. Work with the quality assured professionals already operating in this space and the roll out will be easier and more scalable for all buildings in NI.



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

Yes there are people who need help to live and work in better greener buildings. The way to do this is simple, build upon the processes that already exist, if a person for example is living in an poor home say 'F' or 'G' rated on the EPC, and they meet a criteria for support relating to finances – then they should be able to avail of a plan to assess and deliver the medium term plan to improve the home at no cost. Other people may be able to avail of subsidies for some of this, whilst 'able to pays' can pay for their own. It essential that it is the same PAS2035 process is used, and not different ways for different people. This will not work and will only add confusion. Again as before funding mechanisms and incentives MUST move to the analysis and assessment of the building and the occupants first, before any decisions are made about what changes to make. The amount of funding available for the support of these groups of consumers can then be appropriately split.

Grow a Green Economy

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

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

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

They look sensible



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

It essential in order to do this correctly that we reduce the energy demand of all building first, this is the cheapest energy to save; to do this NI need to have triggers and polices that demand three bits of information for all buildings in NI:

1. The Asset – the building itself must have an assessment using the existing national recognised energy assessment methodologies.
2. The Occupants – an assessment of the people within the building and how they operate it, must build upon the asset so that it is understood how the building will likely use energy
3. Finally, metered (in use data) – this information informs whether the building and occupants are using energy as expected. Where issues arise e.g. using too much energy, or high bill costs, a quick analysis will find the issue, is it with the building itself (fabric or technologies)? Is it that the occupancy has changed? Is it external influences such as severe cold weather or indeed high temperatures has effected the energy use.

With all three sets of data – the building and people in them can understand what is occurring. We have seen many people say, that all we need is metered data and this will solve our issues, this is simply not true. We need all three bits of data to effectively manage all Northern Ireland's buildings. The good news is that all these assessments and process exist, they all just need to be brought together in a joined up coherent set of strategies and polices that work with them.

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

We agree. We must ensure that the EPC reflects current opportunities and proven technologies are recommended to consumers. This means the methodologies must keep up to date and use latest prices, carbon emissions and should suggest up to date and appropriate recommendations.



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

No strong opinion

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

We agree with the principals.

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

We support any mechanisms to help prove innovation works. Once innovation is proven, then there should be a quality assured process to add them when appropriate to national calculation methodologies. The Governance of the methodologies needs to be robust and flexible, and must ensure that only good proven innovation can be used to help drive energy efficiency improvements in all NI buildings.

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

It is essential that only proven technology and innovation is used within the approved methodologies used to measure energy efficiency of buildings, to protect consumers and ensure confidence in the on-going effort to make buildings more efficient. Therefore the way that these new innovations come to market and how they prove themselves needs to be quality assured and allow an easier way into the methodologies. But we stress there needs to be a fair and balanced appraisal of the innovation before it makes its way into the methodologies.

The methodologies must be maintained and updated frequently to ensure they give as close to the truth answer for all buildings and occupants. Significant investment needs to be given to them, so that they continue to be fit to deliver the buildings that NI want to see.



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

No strong opinion

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

Yes, build upon the current processes, identify areas of weakness and build for the future.

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

Sounds sensible, and must ensure it has representatives from the current proven schemes that exist, bringing them together rather than 're-inventing the wheel'.

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

Managing and working with organisations that can help in this space. It is essential to understand that there is no single magic solution that suits every building and occupant. What is good in one location may not be elsewhere. Therefore we all need to accept that we must assess the asset, the occupants and deliver medium term plans for all buildings. If NI want to say set goals of zero carbon, then they must create polices and regulations that drive towards that goal. Incentivise early adopters and penalise those that ignore the requirements. Those that can't afford to make the change should be identified to make sure they are not left behind in cold, damp expensive to operate homes.

PAS2035 and EHC have all the answers. Build polices and long term objectives that work with the new PAS processes.

Do More With Less

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

100%, without a target there is no measurement of success. The national approved calculation methodologies produce the calculations. The Energy Certificate (EPC or DEC) are the outputs, we suggest that NI require all EPCs to display the following energy (kWh), carbon emissions (Kgs) and Cost (£s) for heating, lighting and hot water. By presenting all three as metrics, good policy can use the metric or metrics it would like too. At the moment domestic EPCs for homes use the cost metric and non-domestic buildings display the rating using carbon emissions. Simply display them all, and let consumers choose what is right for them; rather like salt, sugar and carbohydrates for example on food labels.

Northern Ireland then can set the targets it wants, and most importantly build the policies and incentives around them.

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

MEES is the obvious way to set standards for all buildings in NI. Using the national calculation methodologies is clearly the correct way to go. This policy has been effectively in E&W and needs to start sooner rather than later in NI. The worst homes are easy to get better (low hanging fruit) – but by stating a route map and not changing direction, allows people to understand where the policy is heading. It is vital that the enforcement of the regulations is carried through. If it is easier to not comply then unfortunately some people will do this.

We would advocate for up to date EPCs to be demanded for all buildings, the current policies in E&W and only when homes are sold or let, meaning millions of homes do not know how energy efficient they are. By allowing more independent professionals to demand a valid legal EPC you drive up enforcement e.g. banks and lenders for mortgages, solicitors, estate/letting agents etc.



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

The plan is easily achievable as it is always approximately 1 year behind E&W and Scotland, and hence the new methodologies and regulations for those regions can be seen by all stakeholders, and the impact on new build understood. NI must press ahead and use the latest methodologies as soon as possible. It is currently using out of date methodologies and processes for new builds.

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

We agree that the EPC can be used to help formulate the tax system. It makes sense to think about energy efficiency in buildings and encourage all stakeholders with incentives to build new and retrofit older buildings to better energy efficiency standards. There are many ways to use rates and other taxes. They are all incentives and used wisely would encourage a positive move for all owners to improve their building. It must be noted that people who have a lack of disposable income to make the necessary changes need to be the people who get help through grant funds in order that they are not left behind in cold, energy efficient homes. It is therefore essential that carrots, sticks are used appropriately and that all policies are joined up, which is a thread throughout this response. If we want to encourage energy efficiency then makes sure the poorest are not left behind and that funding mechanisms exist for these people.



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

PAS2035 attempts to solve all the requirements of this part of the consultation. It is imperative that NI does not reinvent the wheel. A one stop shop that does it all, may not work. There needs to be enough people on the ground that can deliver at scale the assessments, and retrofit plans for the homes and buildings of NI. The scheme is starting in earnest in E&W at the moment. As discussed before the funding mechanism that is ECO is geared up towards installations. The Each Homes Count review stated that the funding also needs to go into the independent advice, assessment and working with the consumer on what their goals are e.g. a warmer home, cheaper to run; before being pushed towards the good quality installers. This is the model that needs to work for Northern Ireland.

The same system applies to all homes and businesses, there doesn't need to be different ways around it. Firstly measure the energy efficiency of the building and its condition, then the people in it, and then discuss what to do to improve the building. Install the required measures and monitor the success. All these process and skilled individuals work throughout England, Wales and Scotland at the moment. Build upon this, do not make up a different schemes and processes.

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

Fuel Poor people should have routes through the PAS system funded, otherwise they will be left behind.



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

Yes 100%. Currently lenders are being encouraged to make lending decisions in E&W based on the EPC. This helps drive enforcement of MEES PRS legislation as they will not allow buy to let mortgage where it is illegal to do so.

There is a plethora of opportunities for banks and building societies to lend in a green way, to help people make their homes and business premises warmer and cheaper to run. The mechanisms exist, there just need to be incentives for consumers to ask for it, or lenders to deliver it. This is where good quality easy to understand policy and regulations will help deliver.

A critical road map with stages e.g. Band 'D' by year x, Band 'C' by year x would give all stakeholders confidence. Also by using lenders the enforcement of the policy is vitally improved.

Also NI can use this to encourage builders to build better new builds or conversions. For too long the regulations which have always been the minimum standards are the defacto standards. If financial reward was given to get to 'A' rated homes, this would certainly help.

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

As previously PAS2038 which is currently being produced is aiming to solve this for non-domestic properties. It is vital that the same process exists, assess the building first using the national calculation methodologies, consider the occupants behaviour in the asset; work through a medium term plan for the owner/landlord/tenants and deliver the changes required. Monitoring them through meter reads to ensure the desired effect has occurred. All these pieces exist and importantly the skilled professionals called energy assessors. Build upon this rather than keep changing the rules and inventing more and more confusing metrics and ways to decide this.

The business will indeed have different drivers, but the retrofit coordinator can model intended outcomes with the businesses to deliver what they want e.g. lower fuel bill, warmer building, lower carbon emissions etc. Policy and Regulation can then drive behaviour with appropriate carrots and sticks.



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

100% as per answer to 29.

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

Yes, confidence is key. The Trust Mark model is starting at the moment in the E&W. Unfortunately as responded previously the funding model of the ECO policy, which is currently its main user, is not aligned to the PAS2035 process of measuring the building and ensuring the right measures go into the right building in the right order. This is something that BEIS have said will change when ECO moves into it's next phase and they can change the regulations. However NI have a great opportunity to build upon this making sure that the funding model works for the beginning of the process as much as the installation of measures.

The lessons are in the EHC review.



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

In terms of buildings, it is imperative that consumers firstly understand what building they live in and how they currently occupy it, then be given independent advice on how to run it more efficiently. If all consumers received this advice through support policy and legislation in NI, then this is relatively easy. Use the currently trained and practicing energy assessors, and build PAS2035 into the process. This puts the consumer at the heart of it.

There are clearly lots of ways to engage with consumers with websites and information; but all will be high level help. Make sure that at every opportunity NI can build upon energy assessments, and getting these professionals to give good advice. It should be noted that the spirit of PAS2035 was that the Retrofit Coordinator may well create a medium term plan for the building, and give great advice. But during the process of assessment and preparation of plans, that great advice is given in terms of supplier switch, or using controls, timers, thermostats, or ventilation appropriately, that the goal of the home owner has been achieved in that instance. This is exactly what is intended, some 'energy wins' are easy human changes through education and knowledge. Unfortunately at the moment in E&W this process is not being maximised, as it is currently funded by installation of measures, so the vast majority of PAS2035 lodgements occur when a measure(s) are installed. So if the funding model can ensure that monies are available to fund the assessment, advice and medium term plans, then easy and cheap wins can be made by consumers following some education and knowledge. Obviously it would be great that they can go on to install more measures to get a better building over time, but NI must ensure that a market exists for this sector.

It is also imperative that the advice given is independent manner and in the best interest of the building and the current occupants, so it must be given by a competent person, with a robust quality assurance framework to ensure fairness.

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

No strong opinion



Replace Fossil Fuels with Indigenous Renewables

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

Sounds sensible

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

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

If not, what alternative criteria might be used?

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion



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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

Sound sensible and pragmatic

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

We always agree with the approach to stay independent of any technologies or innovations and to make sure that the evidence given is robust and accurate and from this they can be incorporated into the energy assessment methodologies in a reasonably quick time. The system to put them in needs to be robust but flexible enough to incorporate good proven innovations.

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

No strong opinion



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

No, each occupant when they are given choice should be presented with facts about the home and their operation use of it. If then given the various options then it is up to them what they want to do. No homes are the same in this respect. If Government want to encourage a certain path be it low energy homes, low carbon homes, low running costs homes, then they must provide policy and regulations that are clear and long term so that they nudge society in the right direction. As indicated in previous answers, make sure that EPCs deliver all the metrics (carbon, cost and running costs) thus people can be informed in an open and honest way.

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

Any funding is always welcome, and pilots are a great way to trial at a small scale before wider uptake. It is imperative that the pilot uses the existing professionals, and processes in place in order to deliver successfully and doesn't re-invent the wheel, embrace the national calculation methodologies, the energy assessors and retrofit professionals to ensure good quality retrofit – and monitor the success in situ.

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

No strong opinion

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

No strong opinion

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

No strong opinion



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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion



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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion



Create a Flexible and Integrated Energy System

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion



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

We agree that consumers need to see and vitally use their own data to make good decisions. We have always advocated for consumers to have access to the following data that will help drive energy efficiency with the built environment;

- Energy calculation data (RdSAP, SAP or SBEM) for the asset
- The outputs of this data e.g. the EPC or Building Regs compliance (new build)
- Access to occupancy data – note not currently required anywhere in NI. But is needed in PAS2035 framework
- Metered data (in-use)

From the above the owner could know what the asset the home/building should perform, the occupancy makes it more specific for the occupants behaviour within the asset, and then finally the amount of energy actually used in- situ. Given to the homeowners and explained by appropriate independent stakeholders, we know where any issue may lie. If the home uses more energy in reality we can investigate and find out if it is weather related, occupancy related or maybe a fabric or technology issue (e.g. broken thermostat). With all three bits of data we can manage and understand all of NIs buildings. This must be the goal for NI.

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

No strong opinion



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

No strong opinion, but as stated in answer to Q71. Metered data on its own is fantastic but it can't solve the energy debate on its own. Build upon the current infrastructure of asset, occupation and add metered to it. From this we can understand and measure all buildings effectively and be able to make good decisions, be it on the physical asset e.g. cavity wall insulation or heat pump, occupants behaviour e.g. educate on use of opening windows, using immersion heater on timer etc.

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

No strong opinion

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

No strong opinion

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

No strong opinion

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

No strong opinion



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

No strong opinion

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

No strong opinion

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