

# Energy One Stop Shop implementation Plan Consultation

*Comments by*

**Northern Ireland Environment Link**

**27<sup>th</sup> January 2023**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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## **QUESTION 1 – Do you agree with the Energy One Stop Shop underpinning principles?**

Yes.

In paragraph 3.8 of the consultation, on page 7, it says that one of the guiding principles of the one stop shop is that it has the

“Ability to operate as a delivery body: it should have the authority and power to deliver government energy policy objectives”

It would be reasonable for the one stop shop to deliver some energy policy objectives but it is not initially clear from the consultation document exactly what those energy policy objectives might be. Potentially this could mean the one stop shop taking on significant additional energy policy responsibilities which may not be appropriate. If the energy one stop shop has any responsibility for delivery of policy this will likely require additional resourcing, including, but not limited to funding, dependent on the extent of the responsibilities which it is proposed the one stop shop is to have. The efficient management and provision of sufficient resources will be particularly important in the early stages of the one stop shop because if it is perceived to start badly or not function as well as intended, it could be very hard to recover from any resulting reputational loss or lack of confidence.

The issue of the range of delivery responsibilities also raises questions about the independent nature of the one stop shop as government policy can and does change. In the hypothetical scenario of “government energy policy objectives” not fully reflecting the obligations outlined in legislation, for example, in the Climate Change Act (Northern Ireland) 2022, it could be inappropriate for the one stop shop to deliver that government policy objective. It is also possible that in the case where legislation is regarded as out of date or currently inadequate, it might be appropriate for government policy to go further than the existing legislation. As such, there is a need for balance and it may be that setting clear policy direction/goals would be most helpful. These could, for example, include goals such as ensuring the full decarbonisation of energy by 2050, as outlined by the Energy Strategy and Climate Change Act (NI) 2022, protecting the interests of consumers, ensuring the reliable supply of energy, prioritising health and safety and so on. In summary, NIEL believes that clarification is needed from the department as to what the proposal “to deliver government energy policy objectives” means.

## **QUESTION 2 – Do you agree with the definitions for each of the proposed principles?**

In general, yes, but please refer to our response to Q1 above.

**QUESTION 3 – Do you agree with the proposed strategic objectives for the Energy One Stop Shop?**

Generally, yes.

It is possible that greater electrification of energy and transport could mean an increase in the demand for and consumption of electricity in NI but if one of the ultimate goals is to completely decarbonise energy in NI so as to help achieve net zero energy by 2050 then this could include an aim to minimise the overall level of energy consumption. As such, the strategic objective could be amended to refer to “smart decarbonised solutions for power, heat and transport needs, while aiming to minimise the amount of energy consumed in any and all sectors”.

NIEL supports the efforts to ensure greater energy efficiency, for example, in our buildings as means of reducing energy consumption, for example through the provision of a higher standard of insulation. On the basis that sometimes energy efficiency is used in the context of the efficiency of electric appliances, NIEL believes it is important to aim to minimise the overall use of energy as far as possible rather than, for example, potentially having a greater number of more efficient electrical appliances as this could result in little or no reduction in overall energy usage or even an increase in energy use, an outcome described by the Jevons paradox.

**QUESTION 4 – Do you agree that the Energy One Stop Shop should provide advice, information and support to domestic consumers, micro, small and medium businesses and community energy groups?**

Yes.

**QUESTION 5 – Do you agree that the Energy One Stop Shop should take account of the needs of vulnerable domestic consumers, in particular those with low incomes, of pensionable age, digitally excluded, living with chronic ailment or disability or in rural areas?**

Yes.

**QUESTION 6 – Do you agree with the types of services and support that the Energy One Stop Shop should deliver?**

According to the consultation, the one stop shop will: be a single point of contact service; signpost to other relevant service delivery partners; encourage behavioural change: provide

wrap around support and provide non-financial support including training. These are appropriate aims and so NIEL would agree with those proposals. However, it is not entirely clear if the non-financial support including training will, for example, include work with the education and training sectors and/or “delivery partners”? It would be good to know if schools, further and higher education are included in this as well as the general public/consumers and, if this is part of the remit, who the “delivery partners” will be. It is also not entirely clear from the consultation what establishing the one stop shop will mean for other organisations including the Consumer Council for Northern Ireland, the statutory consumer organisation in NI on energy matters and the Utility Regulator. Without greater detail, NIEL’s comments can only be offered at a general, strategic level. NIEL would ask the department to provide more detail on what it sees the non-financial support and training as involving and what the impact(s) of the one stop shop on those other bodies that currently provide advice on energy related matters are likely to be.

**QUESTION 7 – Should the Energy One Stop Shop deliver any other services or activities? If so, list your priorities.**

NIEL has no comment at this point.

**QUESTION 8 – Do you agree with the proposed initial list of consumer engagement channels for the Energy One Stop Shop?**

Yes. NIEL agrees that consumers should be able to access information via branded website and social media accounts; a freephone service; face to face engagement directly or through delivery partners; and through media campaigns. It is important the public know about the one stop shop and how to access its resources.

NIEL would also recommend that the information provided through the various communication channels is accessible for a wide range of audiences including those with any learning and/or language difficulties. This means, for example, that information should be accessible in a range of forms, including braille, and a range of languages to accommodate the needs of the various minority communities in NI.

**QUESTION 9 – Do you agree with the proposed approach to refine and improve consumer engagement?**

Yes.

**QUESTION 10 – Do you agree with the proposal to commence the operation of the Energy One Stop Shop with a Pilot and that it should launch as soon as possible?**

Yes.

**QUESTION 11 – Do you agree with the proposed Energy One Stop Shop Implementation Roadmap?**

Yes. There will need to be clarity on where consumers can or should get advice while the pilot project is in operation. For example, what will the role of the other bodies that currently provide advice be while the pilot one stop shop is operational?

**QUESTION 12 – Do you agree with the proposed services that would be available in Year 1 of the Pilot?**

Yes.

The consultation proposes that one of the services provided in the first year will be

“Detailed information online and through social media, with the initial focus on energy efficiency.”

NIEL would suggest that rather than focusing solely on energy efficiency, the department should aim to minimise the overall level of energy consumption, even when that energy is renewable. As outlined in our response to Q3, if, for example, appliances become more energy efficient, that may lead to more appliances being used and so the overall level of energy consumption may not reduce as much as it could or needs to.

**QUESTION 13 – Do you agree with the proposed additional services that the Energy One Stop Shop Pilot would introduce in Years 2 and 3?**

As outlined in our response to Q3 and Q12, NIEL would suggest that the department should also aim to minimise the overall level of energy consumption, even when that energy is renewable. Please see our response to Q3 for more detail.

**QUESTION 14 – Do you agree with the proposed services that the Energy One Stop Shop may consider introducing from Year 4 onwards?**

As outlined in our response to Q1, the proposal for the one stop shop to also operate as a delivery body is reasonable but it also raises questions about the scope and independent nature of the one stop shop as government policy can and does change.

**QUESTION 15 – Do you agree with the proposal to create a new brand for the Energy One Stop Shop**

Yes. This will be an important part of, hopefully, ensuring that consumers and/or customers know where to access the information and advice they might need.