







# Draft Forward Work Programme 2023-2024

Our draft business plan for the fifth year of our Corporate Strategy 2019-2024









## **About the Utility Regulator**

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team representing each of the key functional areas in the organisation. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

Further information about how we are structured and the work we do is provided at Annex 1.



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### Our mission

To protect the short- and long-term interests of consumers of electricity, gas and water.

## Our vision

To ensure value and sustainability in energy and water.



## Our values

- Be a best practice regulator: transparent, consistent, proportionate, accountable and targeted.
- Be professional listening, explaining and acting with integrity.
- Be a collaborative, co-operative and learning team.
- · Be motivated and empowered to make a difference.









### **Abstract**

This document sets out the non-routine projects that we plan to undertake during 2023-2024. The projects are organised under the three corporate strategy objectives from our Corporate Strategy 2019-2024.

### **Audience**

Given that the document is our corporate business plan with an extended range of projects it is likely that it will be of interest to a variety of audiences – such as industry, other regulators, government bodies and consumer representative organisations.

## **Consumer impact**

While the consumer impact of our business plan is difficult to directly assess in numerical terms, it is likely that the range of projects will contribute to our overarching corporate strategy purpose of protecting and empowering consumers.









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### 1 About this Document

The Energy (Northern Ireland) Order 2003 and the Water and Sewerage Service (Northern Ireland) Order 2006 requires the Utility Regulator to publish a Forward Work Programme (FWP) (or business plan) each year. The plan should 'contain a general description of the projects, other than those routine activities in the exercise of its functions, which it plans to undertake during the year'.

This draft FWP lists the projects that we propose to do during 2023-2024 and is published for consultation. During the consultation, we would particularly welcome views on:

- (1) whether we have prioritised the right projects,
- (2) any objections to our proposed projects; and
- (3) any other comments.

Most of the projects span more than one business planning year. Comments or observations on the timing of projects are also welcome.

Comments should be sent to us **by 21 February 2023** at the latest to: <a href="mailto:barbara.brown@uregni.gov.uk">barbara.brown@uregni.gov.uk</a>

As with last year, we intend to hold provide an opportunity to discuss our draft FWP, with an engagement session planned for **23 January 2023**. Please let us know if you would like to attend by emailing Barbara Brown (see details) **before 16 January 2023** and we will provide the meeting joining details.

A paper copy of the draft FWP can be obtained from: Barbara Brown, The Utility Regulator, Queens House, 14 Queen Street, Belfast, BT1 6ED E-mail: barbara.brown@uregni.gov.uk, Telephone: 028 9031 6326

After reviewing consultation responses we will publish a final FWP by 31 March 2023. Responses to this consultation may be made public by us. If you do not wish your response or name made public, please state this clearly by marking the response as confidential and outline your reasons as to why your response should be treated as confidential. Copies of the document will be made available in alternative formats on request. Key terms used in the plan are highlighted in **purple** and explained in a Glossary (at the end of the document).

#### The structure of this document

The rest of the document is structured as follows:

section 2 - sets out the context for developing the business plan;

section 3 - outlines how we decide on our business plan projects, our core business and the resourcing of our work; and

section 4 - lists of our business plan projects – with new projects shaded in blue.

## 2. The context for our business plan

In this section we briefly outline the key areas influencing the development of our business plan.

**Cost of living** 

In 2022 there was a further acceleration in energy prices. The key driver was exceptional increases in **wholesale** energy costs, which make up over half of final consumer bills. The primary factor for increasing wholesale costs was the war in Ukraine. For consumers, rising energy and other costs saw the headline UK inflation rise to 11.1% during 2022, the highest rate for 40 years. The cost-of-living pressures faced by consumers led to the UK government directly intervening to mitigate the impact of higher energy bills. This led to the UK Government committing funding to support consumers through energy support schemes for households and businesses.

Protecting consumers

Putting consumers at the centre means we are committed to protecting the needs of the most vulnerable. With energy price increasing, and a more general cost of living crisis, our focus on protecting consumers is as important as ever. We worked with government and industry and consumers bodies to support consumers, and this led to the development of a series of voluntary commitments, called an energy charter, to protect consumer of the winter of 2022/2023.

Delivering net zero

The UK government has set a **net zero** *target* for carbon emissions by 2050. Delivering net zero is central to the **energy transition**. A key focus of the Department for the Economy's (DfE's) energy strategy is **decarbonisation**. As a Regulator we approved significant £43 million electricity network investment in low carbon technology during 2021/2022.

Future policy and strategy

We are committed to supporting DfE in implementing the energy strategy for Northern Ireland, and on delivering the strategy action plan. The need for us to be agile, and sufficiently resourced to reflect the evolving strategic landscape in our regulation, is paramount. While affordability and costs are a focus for the strategy, keeping the lights on and building resilience in our energy assets and systems are also key. Making sure that there is a clear plan for reducing carbon so that we can address climate change is also critical. In water, we will continue to work with DfI on the delivery of a Long-Term Strategy for water which covers areas such as leakage and water quality.

**Brexit** 

While the UK left the EU, and the transition period came to an end on 31 December 2020, we continue to work on Brexit implementation issues, particularly our work on the implications of Brexit for the SEM. Specifically this relates to trading arrangements between the Great Britain market and the SEM, and administrative arrangements between Ofgem and the EU energy regulator. These issues will continue to be a focus for our work.

Hybrid working With the Covid 19 pandemic now over, we have taken the learning from this to change how we work. We have developed a **hybrid working model**, which we implemented during 2022. This means that our staff can work seamlessly between Queens House and remotely. As well as providing flexibility, this also ensures that we are as productive as possible. The hybrid working model is also aligned to the working practices of our external stakeholders.

## Security of supply

A secure, long-term and reliable supply remains a priority. In electricity, the SEM capacity arrangements provide a basis for managing long-term security of supply risks. The construction of a second north-south electricity interconnector remains a critical goal for security of supply. In water, the challenge remains of ensuring a reliable supply. The Dfl's Long-Term Water Strategy is focused on security of supply.

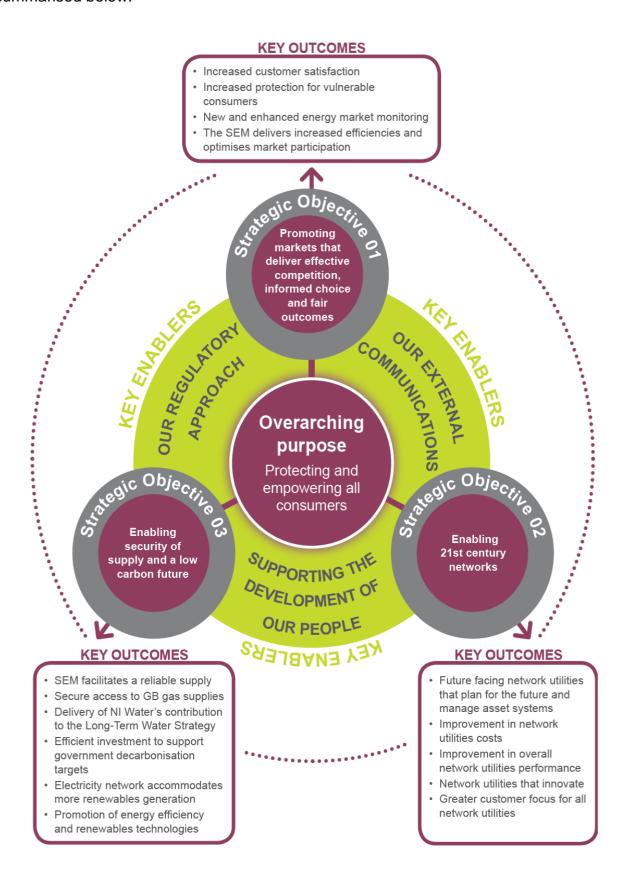
Our Regulation We recognise that the challenges of the future, particularly regarding energy, mean we must be open to change. In practice this may mean that regulators are less prescriptive, more pragmatic, focussed more on principles and outcomes, adopt new approaches to accommodate innovation and a more diverse stakeholder environment. This approach positions regulators more as enablers (e.g., to facilitate major infrastructural projects) with a greater emphasis on making connections between stakeholders. To help us achieve the new approach to regulation, and deliver on the DfE energy and decarbonisation strategy, we are re-structuring to allow us to meet strategic challenges and better align our organisation with our stakeholders. This will see a significant increase in our staff numbers.

Competitive markets

The SEM remains an evolving market and we continue to work to enhance its operation and impact on competitiveness. We continue to keep under review the effectiveness of the **retail market**. The lessons from unprecedented energy prices increases over the last two years, and the impact on consumers, have caused us to reflect on aspects of our retail market regulation.

#### **Our Corporate Strategy**

We developed a new Corporate Strategy for the period 2019-2024. Our strategy is summarised below.



## 3. Our business plan and resources

In this business plan we have set out the most significant projects that will help us to meet our strategic objectives. Most of these projects are multi-year and take more than one year to deliver. Our business plan projects are set out in section five.

This is the final year of our corporate strategy period and we have undertaken a review process to identify our list of business plan projects. Our progress against our corporate strategy has also been reviewed and this has influenced the selection of our projects for 2023-2024. We have also considered projects that commenced during 2022/23 (or earlier), and new workstreams that have emerged. Our assessment process has also considered the scope of our core business and those necessary activities which are undertaken every year to support our regulatory role.

In assessing the priority projects, we have identified those that should be included in the business plan because they meet one or more of the following criteria:

- (1) legislative or statutory requirements;
- (2) government policy requirements;
- (3) regulatory requirements; and
- (4) contribute to the delivery of our corporate strategy objectives.

We previously estimated that around half of our resources (in terms of staff time across the organisation) will be involved in delivering projects that are in this business plan. This will vary, with some parts of the organisation having a greater balance of work towards business plan projects and others having a greater focus on core business.

Supporting the delivery of DfE's Energy Strategy for Northern Ireland, will require increasing levels of resource inputs over the next few years given the task of planning and facilitating delivery of net zero.

We are putting in place a new organisational structure that will significant increase our available resources, which is planned to increase the staffing complement up to 160. This will provide an additional level of staffing and expertise that will allow us meet the challenges of the wider strategic energy and water agenda. During 2023/2024 we will finish transitioning to, and recruiting to complete, the new structure.

#### Our core business

This FWP provides a list of the main non-routine projects that we intend to undertake but these are only part of our overall activities. Work to deliver our core business is described briefly below.

In terms of monopolies, an ongoing part of our work is reviewing the regulated electricity

and gas tariffs and water charges which affect consumers' bills. We also make sure compliance obligations regarding electricity, gas or water networks (infrastructure) are met. Our work to develop this infrastructure includes approving changes to **network codes** and extensions to the gas network. Our monitoring and cost reporting activities relating to regulated companies are also significant commitments.

To achieve our targets on network company performance we have established cost and performance monitoring frameworks. We also encourage regulated utilities, as part of our network price controls, to enhance their approach to asset management so that they compare favourably with their peers.

An important part of our day-to-day work on energy markets relates to the wholesale electricity market. In respect of the SEM there is the core business associated with the ongoing governance, market operations and monitoring arrangements. The SEM's market monitoring unit (MMU) is based at our offices. There is more information on this work on the website at <a href="www.semcommittee.com">www.semcommittee.com</a>. We also regulate the <a href="transmission">transmission</a> system operator for Northern Ireland (SONI) and the Single Electricity Market Operator (SEMO) and support the SEM Committee.

More generally, we monitor the way the wholesale electricity and retail electricity markets work. Our monitoring of energy markets has evolved to provide us with a greater range of information to aid effective market operation and better detect the incidence of market abuse or non-compliance.

Our ongoing work to protect consumers includes issuing, and monitoring compliance with, licences that allow gas, electricity and water companies to operate in Northern Ireland. We have also put in place **codes of practice** relating to consumer protection. Over recent times we have seen a significant increase in the number of regulatory appeals, complaints and disputes which require us to allocate a significant amount of staff time to address.

NI Water continues to improve its relative efficiency and builds on the improvements that have been made. However public funding for NI Water that does not meet identified investment need may negatively impact on the delivery of services and outputs.

As we work within policy frameworks established by DfE (for energy) and DfI (for water), we help these departments by providing regulatory support and carrying out analysis. We also have previously supported the Assembly's Economy and Infrastructure committees, and frequently provided evidence to meetings of these committees. Finally, we also operate the Northern Ireland Sustainable Energy Programme (NISEP).

As a non-ministerial government department, we also are focused on communicating with and involving industry, voluntary organisations, and the public. This includes regular meetings and hosting forums (for example, the Renewables Grid Liaison Group). We try to promote the use of clear and upfront communications. We also comply with a range

of finance, HR, accountability and communications-related reporting requirements. Finally, we regularly respond to correspondence and requests for information from people and organisations (including those relating to Freedom of Information). During the last year the level of contact from members of the public has increased very significantly, largely due to higher energy prices.

#### Delivering our business plan - resources

Due to the scope and scale of our core business and the projects set out in this business plan (as listed in section five), we often must make choices about how to use our resources. This includes prioritising our resources to make sure we target critical projects (for example, in respect of price controls) which affect the timing of other work that contributes to our strategic objectives. The evolving strategic landscape in both energy and water also affects the timing and scope of some of our FWP projects.

Supporting our staff is essential if we are to successfully carry out the projects and meet the objectives set out in our corporate strategy and this plan. We are committed to supporting the development of our staff, promoting the benefits of working for us and recruiting and keeping competent staff. In doing this, we must make sure we have the skills, experience, processes and culture needed for this challenging business plan. We implemented a new leadership programme to support our aspiration.

As a non-ministerial government department, we keep to relevant policies, processes and controls. To support our aim to follow best practice, we will continue to take steps to further improve our regulatory processes and our communications with stakeholders.

Our focus is on making sure that we apply our resources efficiently and this business plan will be challenging to fund and deliver. If new priorities emerge during the year, we will take steps to make sure we have the resources for these. However, doing this may mean we have to delay or reduce our commitment to other business plan projects. In these situations, we will, as far as possible, let relevant stakeholders know.

Alongside the implications of the strategic energy and water agenda, the restructuring of our organisation - and the growth in the overall staffing complement - will have a significant impact on our budget. Delivering on our final FWP and existing business as usual requirements, and funding the growth of the organisation, will mean that the opening budget for 2023/2024 will be significantly higher than our opening budget for 2022/2023 (circa £10.4m net, £12m gross). Our budget for 2023/2024 will be agreed by our Board prior to the publication of our final FWP in March 20203.

Except for the costs associated with some environmental responsibilities and our depreciation charges, we receive all our funding through licence fees. Corporate and shared costs (such as finance, HR, accommodation and IT) are, along with the Chief Executive's office, charged to the gas, electricity and water companies via their licence fees.

## 4. Our business plan projects

## Strategic objective 1: Promoting markets that deliver effective competition, informed choice and fair outcomes

Ref	Project description	Scope and anticipated outcome/s	Link to Corporate Strategy success measures	Lead team	Timing
1	Review our Consumer Protection Programme (CPP) to develop new one for 2024- 2029	Delivering our Consumer Protection Programme projects will provide safeguards for customers, particularly vulnerable customers. Will deliver workplans for domestic consumers, non-domestic consumers and future consumers	KSM 7 Objective 2, KSM 6	Consumer and Business Protection	Multi year
2	Introduce guaranteed service standards for electricity	Will ensure that electricity companies provide consumers with guaranteed levels of service.	KSMs 1, 7	Consumer and Business Protection	Multi year
3	Finalise Best Practice Framework project for electricity, gas and water	Will bring best-practice requirements to how regulated companies deal with vulnerable customers	KSMs 1, 4	Consumer and Business Protection	Multi year
4	Implement new arrangements for ancillary services	Develop transitional arrangements and progress the detailed design of new competitive arrangements for system services.	Objective 1, Objective 3, KSM 1	Markets	Multi year

## **Strategic objective 2: Enabling 21st century networks**

Ref	Project description	Scope and anticipated outcome/s	Link to Corporate Strategy success measures	Lead team	Timing/ Key milestone/s
1	Develop a digitalisation strategy for the electricity networks	Will facilitate delivery of net zero by putting in place a licence obligations leading to a Digitalisation Strategy for electricity networks in Northern Ireland that delivers access to information on Network operation from NIE Networks and SONI.	KSMs 1, 2	Networks and energy futures	Q4
2	Complete mid-term review of the PC21 price control and the delivery Living with Water programme	Will ensure that the company produces quality outputs at lowest cost to consumers and has sufficient revenues to run its business.	KSMs 1, 2, 3	Price controls	Q1
3	Progress the review of the regulatory model with NI Water	Develop with NI Water proposals for appropriate changes to the company's regulatory structure.	Objective 2, 3	Price controls	Multi year
4	Complete the NIE Network RP7 price control review	Ensures that the electricity distribution company produce quality outputs at lowest cost to consumers and has sufficient revenues to run its business while facilitating the energy transition.	KSMs 1, 2, 3, 6	Price controls	Multi year
5	Assist DfE in scoping the future work associated with Smart Meters including review of electricity tariff structures	To include consideration of smart metering. Ensures the structure of tariffs remain appropriate for network industries and customers in light of the energy transition.	KSMs 1, 2, 3, 5	Networks and energy futures	Multi year
6	Scope post implementation issues applicable to biomethane injection	To facilitate delivery of renewable gas in line with developing energy policy and emerging interest in biomethane injection. This will	KSMs 2 and 3	Networks and energy futures	Multi year

Ref	Project description	Scope and anticipated outcome/s  involve review of connections policy and	Link to Corporate Strategy success measures	Lead team	Timing/ Key milestone/s
7	Assess the impact on gas transmission arrangements of projected demand for gas	potential code and licence modifications.  Ensures the gas transmission system can cope with new gas fired electricity generation and will enhance electricity security of supply and facilitate increases gas demand.	KSMs 3 and 6	Networks and energy futures	Multi year
8	Commence a review of electricity connections cost allocation	Consider appropriate allocation of costs and facilitate the energy transition that delivers the net zero targets at lowest cost, and ensures that those who benefit from a connection pay an appropriate charge	Objectives 2 and 3	Networks and energy futures	Multi year
9	Commence preparatory work for SONI TSO 2025-2030 price control	To ensure the appropriate controls are in place within the SONI licence for 2025 and SONI is delivers effectively	KSMs 1, 2, 3, 6	Price controls	Multi year

## Strategic objective 3: Ensuring security of supply and a low carbon future

Ref	Project description	Anticipated outcome/s	Link to Corporate Strategy success measures	Lead team	Timing/ Key milestone/s
1	Deliver SEM capacity auctions in line with programme	Preparations for T-4 capacity auctions will be completed. Ensures the appropriate volume of capacity is secured through the capacity market considering constraints and other factors while optimising security of supply with cost to consumers.	KSM 5	Markets	Multi year
2	Work with DfE on the implementation of energy strategy to help deliver netzero	Will assist DfE in implementing a revised long-term framework for energy in Northern Ireland that will consider the needs of consumers, progress delivery of net zero and facilitate security of supply at an affordable price.	All KSMs	Networks and energy futures	Multi year
3	Work with DfE to administer NIRO and address compliance issues	Statutory duties in respect of NIRO are demonstrated. Building the foundation for the next stage of energy transition to decarbonised electricity supplies.	KSM 1	Networks and energy futures	Multi year
4	Administer NISEP and work with DFE on the future of energy efficiency provision and renewables for Northern Ireland	Will ensure that a new energy efficiency target and related energy efficiency programme delivers for consumers.	KSM 1	Networks and energy futures	Multi year
5	Establish enhanced monitoring arrangements for security of supply in Northern Ireland (electricity and gas)	To put in place enhanced oversight of key developments that may impact security of supply. Will enhance operational effectiveness in mitigating any potential	KSM 5	Markets	Multi year

Ref	Project description	Anticipated outcome/s	Link to Corporate Strategy success measures	Lead team	Timing/ Key milestone/s
		security of supply concerns.			
6	Commence a review of interconnector policy development	To facilitate potential new investment in electricity interconnectors. Enhanced long-term resilience of the Northern Ireland electricity system.	All KSMs	Markets	Multi year
7	Work with DfE to scope out regulatory framework to facilitate offshore wind connections	Allow offshore connection and meet government targets. Increased renewable generation in line with government targets	KSM 1	Networks and energy futures	Multi year
8	Facilitate regulatory framework for flexible technologies in Northern Ireland	Allow innovation, facilitate decarbonisation and improve security of supply.	KSM 1	Markets	Multi year
9	Develop and implement improvements to the SEM capacity market	Enhance the effectiveness of SEM capacity market and enhance both security of supply and overall confidence in market arrangements.	KSM 5	Markets	Multi year
10	Complete an exit review for gas	Creates a level playing field for gas generators in the SEM and potential benefits for a customers.	All KSMs	Networks and energy futures/ Markets	Multi year

## **Organisational Projects**

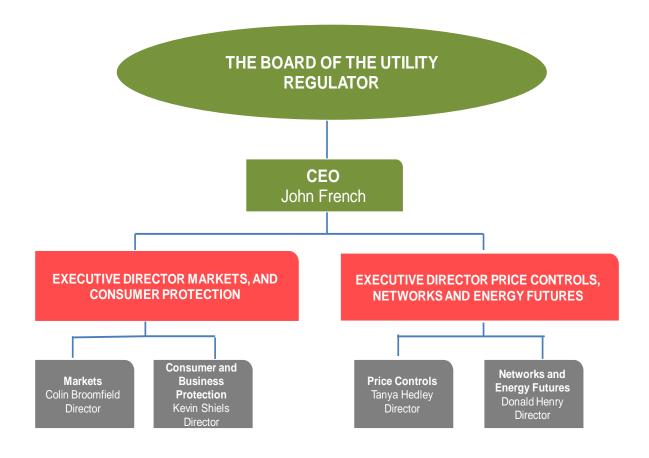
Ref	Project description	Anticipated outcome/s	Link to Corporate Strategy success measures	Lead team	Timing
1	Work with DfE and stakeholders to review the appropriateness of our vires in light of the energy strategy and climate change legislation	Ensures our vires appropriately aligns with energy and climate change policy.	All KSMs	Legal affairs	Multi year
2	Deliver a new customer focused approach to dealing with consumer calls/correspondence	Will improve the holistic approach to dealing with consumer calls/ correspondence.	All KSMs	CEO Office	Q1
3	Produce a new Corporate Strategy	Will provide the opportunity to set a new strategic direction for UR at a time of internal and external change.	All KSMs	CEO Office	Multi year
4	Produce a new Communications Strategy	Will provide the opportunity to reflect a greater consumer focus and external facing focus of the communications function.	All KSMs	CEO Office	Q1

## Annex (i) - About Us

#### Who we are

We are the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries. We are governed by a board whose members are appointed by the Minister for Finance. We are ultimately accountable to the NI Assembly and our work contributes to the overall Programme for Government (PfG) in Northern Ireland.

We are structured to help us deliver our corporate strategy and work better with stakeholders (the wide range of people and organisations we work with). We are organised under two broad groupings covering four divisions (see below).



#### What we do

Our work is based on the duties we have by law (our statutory duties), which include the following:

#### Energy electricity and gas

- Protecting the interests of electricity consumers in relation to price and quality of service, by promoting effective competition where appropriate.
- Promoting the development and maintenance of an efficient, economic and co-ordinated gas industry.

#### Water and sewerage

 Protecting the interests of consumers by promoting an efficient industry delivering high-quality services.

We have wide-ranging statutory duties relating to regulation and competition. We share our duties relating to competition with the UK Competition and Markets Authority (CMA).

#### Our work includes the following:

- Granting licences that allow gas, electricity and water companies to operate in Northern Ireland.
- Making sure licensed companies meet relevant laws and licence obligations.
- Setting the minimum standards of service which regulated companies must provide to consumers in Northern Ireland.
- Making sure that consumers only pay what is necessary for the services they receive now and into the future.
- Challenging companies to make sure they operate efficiently and provide good value for consumers as well as shareholders.
- Working to provide more choice and encourage effective competition in the gas and electricity markets.
- Making sure that regulated companies can fund their activities and are open to new technologies and ways of working effectively.
- Acting as an adjudicator on individual complaints, disputes and appeals.

#### Who we work with

We work with a wide range of stakeholders across several areas to help us protect the interests of consumers.

In carrying out our duties relating to gas and electricity, we work within a policy framework set by the Department for the Economy (DfE). Our statutory duties are the same as DfE's. In carrying out our duties relating to water and sewerage services, we work within a policy framework set by the Department for Infrastructure (DfI).

The SEM Committee (SEMC) regulates the all-island single electricity market (SEM). We work with the Commission for the Regulation of Utilities (CRU), the energy regulator for the Republic of Ireland, on the SEMC. The SEMC's role is to protect the interests of electricity consumers on the island of Ireland by promoting effective competition.

We also work closely with the Consumer Council for Northern Ireland (CCNI), the organisation set up by the Government to represent consumers and other groups across Northern Ireland.

Our work sits within a broader setting, and we work closely with other regulators. These include the energy and water regulators for Great Britain (Ofgem, Ofwat and the Water Industry Commission for Scotland).

We also work with the CMA and with other regulators across the UK through the United Kingdom Competition Network (UKCN). This provides a co-ordinated approach to identifying and responding to competition issues and promoting best practice.

Finally, we are active members of the United Kingdom Regulators Network (UKRN), which includes representatives from economic regulators across the UK. The network seeks to ensure the effective co-operation between sectors and has produced a range of publications.

## Annex (ii) - Glossary

Ancillary services	Services necessary for the secure operation and restoration of the electricity system
Capacity auctions	These are competitive auctions where generators secure agreements to produce electricity when called upon at a time in the future.
Codes of practice	Documents that provide information on the standards of a range of services.
Energy transition	The <i>energy transition</i> is a pathway toward transformation of the global <i>energy</i> sector from fossil-based to zero-carbon by the second half of this century.
Guaranteed standards of service	These set out prescribed service levels which individual consumers can expect from electricity companies, including compensatory payment requirements when the company has failed to adhere to the standards (subject to certain exemptions)
Hybrid working model	This is a flexible work model that supports a blend of in-office, remote, and on-the-go workers
Network codes	Contractual arrangements between the network system operator and network users to make sure the network runs efficiently.
Net zero	Refers to the balance between the amount of greenhouse gas produced and the amount removed from the atmosphere. Net Zero is reached when the amount we add is no more than the amount taken away.
Price control	Price controls are one of the main tools we use to protect consumers. This involves the regulator studying the business plans of utility companies and calculating the revenue they need to finance their activities while providing incentives to invest in the business.
Retail energy market	The activities of electricity and gas suppliers and their interactions with consumers.
Single electricity market (SEM)	The SEM was originally set up in November 2007. It is the single wholesale market for electricity which operates in both the Republic of Ireland and Northern Ireland. It aims to improve the reliability of supplies and the range of suppliers, encourage market efficiencies and economies, and promote greater competition. An enhanced SEM market came into operation on 1 October 2018.
Wholesale market	The wholesale market is where generators sell their electricity to suppliers.
·	