CRU Electricity Network Tariff Structure Review

Joint Submission – Civil Society Energy Poverty Network

November 2026

This joint submission is made by members of the civil society energy poverty network, a group of NGOs advocating for an end to energy poverty and a just energy transition in which every household can afford to meet their energy needs.

This submission is made by Friends of the Earth, Irish National Organisation of the Unemployed, Irish Rural Link, National Women's Council of Ireland, Social Justice Ireland, Age Action, Environmental Justice Network Ireland, and the Society of St Vincent de Paul.

This Electricity Tariff Structure Review is happening against a backdrop of exceptionally high electricity prices for Irish consumers and widespread difficulty in meeting energy needs for many households. Ireland had the highest electricity prices in the EU in the first half of 2026 according to Eurostat.[1] In Q2 of 2026, the CRU reported that 323,559 domestic electricity customers were in arrears -14% of all households.[2] Requests to the Society of St Vincent de Paul for help with energy increased by 66% since the end of 2021, rising to over 33,000 in 2025.[3]

Network charges currently account for approximately one quarter of a residential electricity bill and therefore have significant impacts on affordability of electricity for households. As significant investment is made in electricity infrastructure in the coming years to facilitate electrification and decarbonisation, decisions about how network costs are distributed and recovered must be made with particular consideration for households in, and at-risk of, energy poverty.

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[1] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Electricity_price_statistics

[2] https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/Arrears_and_NPA_disconnection_update_August_2026.pdf

[3] SVP_Pre-Budget_Submission_2027.pdf

The central concern of our joint submission is that cost-reflective tariffs alone will not guarantee equitable outcomes. Households have a wide variety in essential energy needs, in financial circumstances, and in capacity to respond to price signals or invest in new technologies.

We therefore believe that the effectiveness and the fairness of network tariff reforms must be assessed against measurable distributional and affordability impacts, rather than assuming that cost-reflective tariffs will automatically deliver equitable benefits across all consumer groups.

Our Primary Recommendations for the ENTSR are as Follows:

1. The overarching objective should be amended to promote a "cost-efficient and **equitable** use of the electricity network in a way that supports electrification and **a just transition away from fossil fuels**."
2. Explicitly incorporate **equity, affordability and distributional impacts** into the assessment principles guiding this review.
3. Distributional impact analysis should be completed early enough in the process to **inform the choice and design of tariff options from the outset,** rather than solely their implementation. It should assess impacts both between different customer categories and amongst households with differing energy needs and capacities to respond to price signals.
4. Ensure that tariff reform does not penalise households for **essential electricity consumption that they cannot reasonably reduce or shift.** We recommend that households should not be required to participate in dynamic or highly differentiated time-of-use tariff arrangements where they have limited capacity to shift essential electricity consumption. The CRU should also examine targeted tariff arrangements to protect households experiencing energy poverty, including social tariff mechanisms.
5. Tariff reform must therefore not only protect households with limited flexibility from disproportionate costs, but also **support equitable access to the benefits of electrification and flexibility**. The CRU must explicitly assess consumers' differing capacities to respond to price signals and consider how tariff structures can facilitate

participation by low-income households, renters and communities, including through renewable energy sharing and community energy initiatives.

6. There must be **greater transparency in the allocation of network costs** attributable to different categories of demand, and the CRU must ensure that **households are not disproportionately burdened** by infrastructure costs driven by large commercial electricity users.
7. Ensure meaningful participation by organisations representing households experiencing energy poverty, as well as affected households themselves, throughout subsequent phases of the review, including through accessible engagement opportunities beyond written consultations.

1. Overarching Objectives

We believe the CRU's proposed overarching objective of promoting "*cost-efficient use of the electricity network in the context of electrification and decarbonisation"* should be strengthened to explicitly recognise the role of network tariff design in supporting an equitable and just transition away from fossil fuels. While cost-efficient use of the electricity network is important, tariff reform must also support the decarbonisation of heating and transport, while ensuring that the costs and benefits of electrification are distributed equitably.

Whilst government grants and income supports are essential to addressing both energy poverty and enabling a transition away from fossil fuels, they cannot substitute for fair and equitable network tariff design. Decisions about how network costs are recovered, including the balance between fixed charges and charges linked to consumption patterns, will affect the affordability of essential electricity use for households with differing abilities to reduce or shift demand. Tariff design will also influence the financial benefits available from flexibility and renewable energy sharing, potentially reinforcing existing inequalities if these benefits are accessible primarily to households with the resources and ability to invest in enabling technologies.

We therefore propose that the overarching objective be amended to promote a "cost-efficient and equitable use of the electricity network in a way that supports electrification and a just transition away from fossil fuels."

2. Assessment Principles

We additionally call on the CRU to explicitly incorporate equity, affordability and distributional impacts into the assessment principles guiding this review. Despite stakeholders identifying these additional principles in both the 2021 and 2025 Calls for Evidence, these considerations are absent from the CRU's proposed five assessment principles.

The effectiveness and fairness of tariff reforms must be assessed against measurable distributional and affordability impacts, rather than assuming that cost-reflective tariffs will deliver equitable outcomes across all customer groups.

3. Distributional Impact Analysis

While we welcome the CRU's commitment to undertaking distributional impact analysis in later phases, this analysis **should be completed at the initial stages of the review process in order to inform the choice and design of tariff options from the outset, rather than solely their implementation.**

The CRU states that it will assess the impact of tariff design options on 'customer groups' through distributional analysis. We strongly advocate for this distributional analysis to go beyond existing customer classifications (DG1/DG2) and to incorporate potential impacts on households with different levels of electricity use at home. It should examine impacts both between different customer categories, including large commercial energy users vs households, and differing household types and consumptions patterns within the domestic sector, particularly for households experiencing energy poverty and those unable to respond to price signals.

The allocation of network costs must support a just energy transition, ensuring that households are not disproportionately burdened by the costs of infrastructure expansion associated with large commercial electricity demand.

4. Protection of Essential Energy Use

Tariff reform must protect the affordability of essential electricity consumption, particularly for households experiencing energy poverty. Many low-income households are already restricting their energy consumption to manage costs, including going without adequate heating or limiting other essential energy use. For these households, there is often little or no scope to reduce consumption further without compromising their health and wellbeing. **It is therefore critical that network tariff design distinguishes between discretionary electricity use that consumers can reasonably reduce or shift, and essential consumption over which households have limited control.**

We are concerned that changes to network tariff structures could increase costs for households who have little capacity to respond. Higher fixed network charges would increase unavoidable costs for households already minimising their electricity consumption, while higher consumption-based or peak-time charges could disproportionately affect those with high essential electricity needs, including households relying on medical equipment or electric heating. **We therefore call on the CRU to ensure that tariff reform does not penalise households for essential electricity consumption that they cannot reasonably reduce or shift. This is why it is vital that equity, affordability and distributional impacts must be embedded as explicit assessment principles in this review.** These principles would provide a basis for evaluating and choosing tariff options that take into account household differing circumstances and capacities to respond to price signals

We recommend that households should not be required to participate in dynamic or highly differentiated time-of-use tariff arrangements where they have limited capacity to shift essential electricity consumption. Such arrangements should be optional, with appropriate consumer safeguards to protect against sudden or disproportionate increases in costs.

We additionally recommend that the CRU examine the potential for **targeted tariff arrangements to protect households experiencing energy poverty,** including through Social Tariff mechanisms, as implemented in other EU states. Such arrangements could help ensure that essential electricity consumption remains affordable for financially vulnerable households and should be designed to avoid shifting additional costs onto other low-income consumers.

5. Unequal Capacity for Flexibility & Electrification

The CRU must recognise that electricity consumers have vastly different capacities to respond to network tariff signals and benefit from flexibility. A 2026 systematic review of 66 studies on household demand-side response found that energy-vulnerable households face heightened risks of financial disadvantage, thermal discomfort and psychological stress, while highlighting the importance of appropriate safeguards and inclusive tariff design in enabling these households to benefit from flexibility. [4]

Large commercial electricity users may have the technical and financial capacity to manage demand and optimise network charges. Similarly, higher-income households may be able to invest in solar PV, battery storage, smart heating controls or other technologies that enable them to shift consumption and benefit from flexible tariffs. However, many low-income and energy-poor households face significant financial and practical barriers to accessing these opportunities. Renters may have little control over the energy efficiency of their homes, heating systems or the installation of new technologies. Other households may lack the upfront capital or access to grants needed to invest in electrification and flexibility. **For households already minimising their energy consumption, stronger price signals alone will not provide meaningful opportunities to reduce costs.**

Research from Pobal and UCD shows that households in disadvantaged communities are five times less likely to use renewable technologies than those in affluent areas (9% renewable

[4] https://www.sciencedirect.com/science/article/pii/S2214629626001003#s0025

adoption vs 45%).[5] Without recognising these inequalities and constraints, **tariff reform risks creating a two-tier electricity system in which households with the means and agency to invest can reduce their electricity costs, while those unable to participate bear a disproportionate share of remaining network costs.**

We recognise that network tariff design alone cannot overcome the financial and practical barriers faced by low-income households, and that wider Government supports are essential. However, network tariff structures will themselves shape households' opportunities to participate in and benefit from electrification, flexibility and renewable energy. **The CRU therefore has a responsibility to ensure that the tariff structures it designs do not create or reinforce barriers to participation for low-income households and disadvantaged communities.**

We call on the CRU to consider how network tariff design can facilitate participation by low-income households, renters and communities, including through renewable energy sharing and community energy initiatives. **The CRU must also explicitly assess consumers' differing capacities to respond to price signals when developing and evaluating tariff options.** The effectiveness and fairness of reforms should be assessed against measurable distributional and affordability impacts, rather than assuming that cost-reflective tariffs will deliver equitable outcomes across all customer groups.

6. Large Energy Users

The current rapid growth of large energy users such as data centres in Ireland raises questions about how electricity network costs are allocated amongst different categories of consumers. Data centres accounted for 23% of Ireland's metered electricity consumption in 2025 and is

[5] https://www.pobal.ie/disadvantage-communities-almost-five-times-less-likely-to-benefit-from-renewable-energy-at-home/

projected to increase. This substantial electricity demand is contributing to the need for significant investment in network infrastructure. Under current regulatory framework, these costs can be classified as shared infrastructure and recovered through network charges paid by households and other consumers.[6] Currently, publicly available information does not adequately identify the proportion of network investment attributable to data centres or the resulting costs borne by households.

We believe that the CRU's proposed principle of cost reflectivity must be applied rigorously across all customer categories, including large energy users. This must include consideration not only of how network costs are distributed between customer groups, but also of which categories of demand are driving the need for additional network investment. **Households whose electricity consumption remains unchanged should not be disproportionately burdened by increased network costs arising from the additional demands of large commercial electricity users.**

We therefore call for greater transparency in the identification and allocation of network costs attributable to different categories of demand, and for the CRU to ensure that network tariff structures reflect the causes of additional network costs, while protecting domestic consumers from disproportionate increases.

7. Participation

Finally, we call on the CRU to ensure meaningful participation by organisations representing households experiencing energy poverty throughout subsequent phases of the review. Given the technical complexity of network tariff design, **engagement should extend beyond written consultations to include accessible opportunities** for consumer representatives and affected households to contribute to the development and assessment of tariff options.

[6] https://lynnboylan.ie/wp-content/uploads/2026/09/By-Design-Not-By-Default.pdf