

Response Information

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Login Info

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Invitee:

Response Details

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4 - Question 3.1

Do you agree with our proposal that the EEOS should cover entities across all the main energy markets - electricity, natural gas, liquid fuel and solid fuel?

Yes

6 - Question 3.2

Do you agree with our proposal to obligate the following types of eligible parties within each market, should they be above a certain size, that is:

*a) of the eligible parties in the liquid fuel market, only the liquid fuel importers operating in Ireland;

Yes

8 - b) of the eligible parties in the solid fuel market, all entities, including all distributors and suppliers operating in Ireland;

Yes

10 - c) of the eligible parties in the gas and electricity markets, only retail energy supply companies operating in Ireland

Yes

12 - Question 3.3

Do you agree with our proposal to set the obligation threshold in terms of annual final energy sales volume (GWh)?

Yes

13 - Please provide reasons to support your response.

Great to see move to final energy - primary energy has caused endless confusion to end-users and conflation by unscrupulous or uninformed parties.

14 - Question 3.4

Do you agree with our proposal to set the obligation threshold level at final energy sales of 400 GWh per annum, combined with the introduction of a free allowance?

Yes

16 - Question 3.5

Do you wish to provide any specific comments in relation to the target setting approach?

No

18 - Question 4.1

Do you agree with our proposal that 60% of Ireland's Article 7 obligation for 2021-30, equivalent to 36,424 GWh cumulative final energy savings, should be met by an Energy Efficiency Obligation Scheme?

Yes

20 - Question 4.2

Do you agree with our proposal that the EEOS Target should be disaggregated, with a 40% target allocated to all transport energy suppliers and distributors (the Transport Sales Target), and a 60% target allocated to all non-transport energy suppliers and distributors (the Non-transport Sales Target)?

Yes

22 - Question 5.1

Do you agree with our proposal that a certain proportion of obligated parties' energy savings must come from measures delivered in the residential sector (the Residential Delivery Sub-target)?

Yes

24 - Question 5.2

Do you agree that, of these residential savings, a certain proportion must also come from activity in energy poor homes (the Energy Poverty Delivery Sub-target)?

Don't know / No Strong opinion

26 - Question 5.3

Do you agree with our position not to specifically require that a portion of the EEOS Target must be met by obligated parties through savings from measures in the transport sector?

Yes

27 - Please provide reasons to support your response.

Transport has proved to be a particularly hard sector from which to gather quality (metered) data, so flexibility is needed.

Recognition by international bodies (EU CCA, GLEC etc.) of the data quality in EEOS to date is also confirmation of the challenges faced around the world in this area.

Question 5.4

Do you agree with our proposal that at least 15% of all EEOS savings, equivalent to 5,464 GWh cumulative final energy savings, must be delivered in the residential sector?

Don't know / No Strong opinion

30 - Question 5.5

Do you agree that at least 5% of the EEOS Target (a third of the Residential Delivery Sub-target), equivalent to 1,821 GWh cumulative final energy savings, must be achieved through measures delivered in energy poor homes?

Don't know / No Strong opinion

32 - Question 5.6

Taking account of the worked examples provided in Appendix 3, do you agree with our proposed approach in how the delivery sub-targets are allocated to obligated parties?

Yes

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34 - Question 6.1

Do you agree with our proposed requirements for delivery under the Residential Delivery Sub-target (excluding the Energy Poverty Delivery Sub-target)?

Don't know / No Strong opinion

36 - Question 6.2

Do you agree with our proposed requirements for delivery under the Energy Poverty Delivery Sub-target?

Don't know / No Strong opinion

38 - Question 7.1

Do you agree with our proposal to implement annual additive targets up to 2030, which obligated parties will be required to meet every year?

Yes

40 - Question 7.2

Do you agree that each obligated party's 2021 delivery, rather than their 2021 targets, should be considered in the calculation of targets for the remaining nine years of the obligation period?

Yes

42 - Question 7.3

Do you agree that obligated parties should be allowed to count savings achieved on their behalf by third parties towards their targets?

Yes

43 - Please provide reasons to support your response.

Third party competition in EEOS has been instrumental in developing the energy services sector, so yes let these savings be counted - provided the OP can be shown / proven to be demonstrably material to the project from the outset.

EEOS has provided a risk taking mechanism unavailable via government supports e.g. test equipment, trials and pilots have all been funded under EEOS which are almost impossible to fund via grants due to procurement rules.

44 - Question 7.4

Do you wish to provide any suggestions or comments in relation to this flexibility mechanism?

Yes

- 45 -** Focus of flexibility criteria must be on the OP being demonstrably material to the project, programme or measure from the outset.

In the early days of EEOS the touting of 'credits' around OPs who had nothing whatsoever to do with the project meant that the condition of additionality could not be met, nor could a proper M&V be carried out so long after the fact.

Proper M&V starts with a measurement plan as early as practicable in the project and this is when the OP should be engaged - otherwise there is no element of risk taking by the OP or making additional projects happen, they could have happened anyway and would not meet the additionality criteria.

The fact that some third parties still feel they can come to a programme or project as much as 5-6 years after the fact and submit a (very flimsy) NREC speaks to the need for greater clarity in this area.

Evidence of additionality and demonstrably material may be as simple as time stamped emails and web forms but it must be there.

46 - Question 7.5

Do you agree that a minimum achievement requirement should be put in place, which would mean that if an obligated party achieves at least 95% of its annual additive target, with the exception of the final year of the obligation period, they are deemed compliant?

Yes

48 - Question 7.6

Do you wish to provide any suggestions or comments in relation to this flexibility mechanism?

Yes

- 49 -** Even metrology checked meters are only 99% accurate i.e. $\pm 10,000\text{kWh}$ in every 1,000,000, activity meters are even loser (speedometers deliberately under read by 5%) so some allowance is needed to balance the books in real world reporting of energy savings.

50 -

Question 7.7

Do you agree that obligated parties should be allowed to exchange validated credits bilaterally?

Yes

51 - Please provide reasons to support your response.

Exchange is fine, trade is not.

52 - Question 7.8

Do you wish to provide any suggestions or comments in relation to this flexibility mechanism?

No

54 - Question 7.9

Do you think it could be beneficial to allow obligated parties to bilaterally trade all or part of their targets?

No

56 - Question 7.10

Do you wish to provide any suggestions or comments in relation to this flexibility mechanism?

Yes

57 - Trading credits takes us back to challenge of proving additionality and being demonstrably material, putting a tradable value on the credit will lead to the chain of evidence being broken e.g. GDPR will be invoked to stop communications (its even invoked to stop access to meters).

Exchange at least ensures some degree of openness or trust between OPs, tradable values will fundamental alter that exchange to the detriment of the high quality data and M&V EEOS has delivered to date in Ireland

58 - Question 7.11

Do you think there should be a buy-out mechanism in place for the 2021-30 EEOS, which would allow obligated parties to buy out a proportion of their EEOS targets by contributing to an Energy Efficiency National Fund?

Yes

60 - Question 7.12

Do you think that the buy-out cap should be set at a maximum of 30% of targets?

Yes

62 - Question 7.13

Do you wish to make any suggestions on how buy-out prices are set, which would ensure the State is not financially disadvantaged and the relevant requirements of the EED are taken into account?

No

64 - Question 7.14

Do you wish to provide any suggestions or comments in relation to this flexibility mechanism?

No

66 -

Question 7.15

Do you agree with all, or part of, our proposed approach to non-compliance and penalties?

Yes

68 - Question 7.16

In your opinion, how should penalties for non-compliance be determined, i.e. what factors should be considered as part of any calculation framework?

Don't know / No Strong opinion

70 - Question 7.17

Do you wish to provide any suggestions or comments in relation to any aspect of this proposal?

Yes

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72 - Question 8.1

Do you wish to raise any issues or make any suggestions on improvements that could potentially be made, in relation to the redesigned EEOS, beyond those discussed in this document?

Yes

73 - **Increase Promotion and Pace.**

Promotion. Many corporates and SME's think EEOS is a scam, it needs a ridiculous amount of effort to convince them otherwise - increasing costs.

Pace. The process has become so slow that very often the personnel on site have changed or left the company leading to discontinuity at every level in the process. Any new EEOS should aim for rolling quarterly returns, automated where possible, to give end-users faster conclusion to their applications. Elected reps e.g. Minister should not form part of the process as their absence leads to long delays, and disbelief amongst end-users particularly FDIs. Faster feedback (in kind or cash) will encourage more projects accelerating the achievement of targets. Which is the whole point of the process. Slow feedback (extended to years now in almost all sectors) has broken the reputation EEOS had amongst end-users to the point where it is now regarded as a 'grant' and

74 - Question 8.2

In your opinion, how often should the scheme be reviewed, e.g. after three years; after four years; after five years?

Don't know / No Strong opinion

76 - Question 8.3

Do you agree with our proposal to require obligated parties to report their EEOS cost data to SEAI?

No

77 - Please provide reasons to support your response.

It would be in my companies interests to see the costs. But for the reasons above wrt trading and exchange, its a competitive market and it seems to work, if it ain't broken etc..

78 - Question 8.4

Do you wish to make any suggestions on how such data is reported, e.g. the level of detail, format and frequency of reporting?

No

80 - Question 8.5

Do you agree that cost data should be published, provided all commercial confidentiality concerns are addressed?

Yes

81 - Please provide reasons to support your response.

If it exists lets see it.

82 - Question 8.6

Question 8.6: Do you wish to make any suggestions on how such data is published, e.g. the level of detail, format and frequency of publishing?

No

84 - Question 9.1

Do you think that there a case for the provision of additional information to all consumers, via bills or otherwise, on their consumption and/or on potential energy savings?

Yes

85 - Please provide reasons to support your response.

Watch the reaction to a live feed from an fairly dumb meter, smart meters that can present electric, gas and water use in one place will have a dramatic effect.

Use the data available to the CRU to give consumers feedback on their use and simple tips e.g.

Your use compares to average household as up/down/about the same

Did you know turning down the thermostat saves XXX, similar with water etc.

For commercial users promote EEOS to a common landing page for all supports categorised by sector or technology and let the OP's choose where they want to promote themselves.

Please update the OP contact details (personal email now) to an online form that lets SEAI see activity from the above actions to OPs.