

Response Information

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Login Info

User Name: AnonymousRespondent

Invitee:

Response Details

Page 2

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

5 - Please provide reasons to support your response.

Currently all of these industries contribute significantly to green house gas emissions.

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;
Don't know / No strong opinion

8 - b) of the eligible parties in the solid fuel market, all entities, including all distributors and suppliers operating in Ireland;
Don't know / No strong opinion

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.

It provides the right incentives to decarbonise.

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?

Don't know / No Strong opinion

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?

Don't know / No Strong opinion

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

21 - Please provide reasons to support your response.

Transport emissions are significant and policies are needed to reduce emissions in this area.

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)?

No

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?

No

27 - Please provide reasons to support your response.

Transport emissions are a significant proportion of all emissions in Ireland and so a sectoral target for transport should be put in place.

28 - 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?

No

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?

Don't know / No Strong opinion

Page 3

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?

Don't know / No Strong opinion

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

41 - Please provide reasons to support your response.

Emissions will only reduce based on delivery, not targets.

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?

Don't know / No Strong opinion

43 - Please provide reasons to support your response.

It depends on their ability to effectively prove additionality.

44 - Question 7.4

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

No

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?

Don't know / No Strong opinion

48 - Question 7.6

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

No

50 - Question 7.7

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

Don't know / No Strong opinion

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?

Don't know / No Strong opinion

56 - Question 7.10

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

No

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?

No

59 - Please provide reasons to support your response.

No as the cost of buy-out would be hard to determine and likely be set too low. Also, any buyouts that occur early on in the scheme have larger impacts on emissions reductions as the savings do not have time to accumulate. I would only support this in the very late years of the scheme (last 2 years) as a means to raise additional revenue to support further action if the obligated parties had substantially missed their targets. In this way, it would act as a fine for non-performance.

60 - Question 7.12

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

Yes

61 - Please provide reasons to support your response.

If a buy-out is considered, some cap should be set, but it should also only be allowed towards the end of the scheme and not at the start.

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

63 - Don't know enough about this to comment

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?

Don't know / No Strong opinion

67 - Please provide reasons to support your response.

didnt see this

69 - Please provide reasons to support your response.

Penalties should be much larger at the beginning of the scheme as the cumulative impact of the savings lost will be larger.

70 - Question 7.17

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

No

Page 4

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?

No

76 - Question 8.3

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

Yes

77 - Please provide reasons to support your response.

Yes, but not just cost data, also energy savings data.

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?

Yes

79 - Meter level data provided at the lowest level of granularity possible, provided once a month at least.

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.

Transparency is important.

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?

Yes

83 - Every year, as detailed as possible.

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.

Energy bills should be simplified and social comparisons (like those used by Opower) should be mandatory on all energy billing.

86 - Question 9.2

How could the provision of such information be implemented cost effectively and in a way that benefits all consumers, whether on bills or otherwise?

Don't know / No Strong opinion