

Response Information

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IP Address: [REDACTED]

Login Info

User Name: AnonymousRespondent

Invitee:

Response Details

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1 - Name

[REDACTED]

2 - Company

Climate Action Regional Office Atlantic Seaboard South

3 - Email

[REDACTED]

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.

Yes. These energy markets significantly contribute to CO2 emissions in Ireland.

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

7 - Please provide reasons to support your response.

This proposal provides an improved methodology for accounting for liquid fuel usage in Ireland and its consequential CO2 impact

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

Yes

9 - Please provide reasons to support your response.

The threshold should be appropriately set to allow small scale operators provide a service to the public.

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

Yes

11 - Please provide reasons to support your response.

Any regulation coming from this proposal should ensure that there is full accountability of CO2.

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.

Yes. This proposal will provide a transparent method of calculating final energy sales volume and CO2 emissions.

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

15 - Please provide reasons to support your response.

This proposal provides an improved methodology for accounting for fuel usage in Ireland and its consequential CO2 impact. The free allowance appears to be appropriately set to allow small scale operators provide a service to the public.

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

19 - Please provide reasons to support your response.

DECC is best placed to determine the limits.

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.

Yes. Emissions from the transport sector are a major contributor to climate change and emissions from transport are increasing markedly when compared to other sectors. It accounted for over 40% of Ireland's final energy consumption in 2019.

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)?

No

23 - Please provide reasons to support your response.

The residential sector is responsible for 25% of emissions and the 15% should be increased to reflect this.

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)?

Yes

25 - Please provide reasons to support your response.

Yes. Energy poverty is still prevalent in Ireland. We have a large older building stock particularly in our towns and cities. Local Authorities manage a large and diverse portfolio of housing and we have many tenants experiencing fuel poverty. More targeted action at energy poor homes would be welcome.

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.

Emissions from the transport sector are a major contributor to climate change and emissions are increasing. To ensure that there is full accountability for CO2 emissions, DECC are best placed to develop a methodology with respect to the transport sector.

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?

No

29 - Please provide reasons to support your response.

The residential sector is responsible for 25% of emissions and the 15% should be increased to reflect this.

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

31 - Please provide reasons to support your response.

DECC are best placed to set the minimum sub-target threshold.

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?

No

33 - Please provide reasons to support your response.

The residential sector is responsible for 25% of emissions and the 15% should be increased to reflect this.

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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)?

Yes

35 - Please provide reasons to support your response. Where you do not agree with any aspects of the above proposal, please be as specific as possible in your response, including any suggestions you wish to make, taking account of the broad policy intent and the additional points included for consideration.

Yes. The B2 target is in line with the ambitions and targets set out in the Climate Action Plan.

36 - Question 6.2

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

Yes

37 - Please provide reasons to support your response. Where you do not agree with any aspects of our proposal, please be as specific as possible in your response, including any suggestions you wish to make, taking account of the broad policy intent.

Energy poverty is still prevalent in Ireland. We have a large older building stock particularly in our towns and cities. Local Authorities manage a large and diverse portfolio of housing and we have many tenants experiencing fuel poverty More targeted action at energy poor homes would be welcome.

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

39 - Please provide reasons to support your response.

DECC are best placed to decided and administer the annual target calculation.

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.

DECC are best placed to decided and administer the annual target calculation.

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.

This allows the obligated parties to avail of specialised expertise to assist in project delivery.

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?

Yes

47 - Please provide reasons to support your response.

This appears reasonable and is in-line with the existing scheme.

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

51 - Please provide reasons to support your response.

DECC and SEAI are best placed to comment on this.

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

55 - Please provide reasons to support your response.

DECC and SEAI are best placed to comment on this.

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?

Yes

59 - Please provide reasons to support your response.

Any funding mechanism for a National Energy Efficiency Action Fund would be beneficial.

60 - Question 7.12

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

Don't know / No Strong opinion

61 - Please provide reasons to support your response.

DECC and SEAI are best placed to comment on this.

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?

Don't know / No Strong opinion

67 - Please provide reasons to support your response.

DECC and SEAI are best placed to comment on this.

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

69 - Please provide reasons to support your response.

DECC and SEAI are best placed to comment on this.

70 - Question 7.17

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

No

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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?

No

75 - Please provide reasons to support your response.

Given that there will be a requirement for annual Climate Action Plans, I suggest that the scheme should be reviewed after three years.

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.

There should be transparency in this scheme.

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.

There should be transparency in this scheme.

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

83 - DECC and SEAI are best placed to comment on this.

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.

There needs to be CO2 emissions information available to all consumers.

87 - Please provide reasons to support your response.

The information should be clearly included on energy bills