

Energy Efficiency Obligation Scheme,  
Department of the Environment, Climate and Communications,  
29-31 Adelaide Road,  
Dublin 2,  
D02 X285.

Date: 30<sup>th</sup> April 2021

**RE: Public Consultation on the redesign of Ireland’s Energy Efficiency Obligation Scheme**

Dear Sir / Madam,

Brookfield Renewable Ireland welcomes the opportunity to respond to the public consultation on the redesign of Ireland’s Energy Efficiency Obligation Scheme (EEOS).

Brookfield Renewable Ireland is one of the largest owners and developers of renewable assets in Ireland holding 100% of the operating wind farms in Ireland, employing 99 people in Cork and our rural offices across Ireland.

With a operational base of over 360 MW, Brookfield Renewable plans to continue bringing new renewable energy onto the system over the decade, further contributing to the decarbonization of the Irish economy.

EEOS comes applies to us as a supplier of renewable electricity. We operate in a unique space in the market. We are the largest supplier of 100% indigenous renewable electricity to the Large Energy User (LEU) sector. We are fifth largest supplier in overall terms in this market according to the latest CRU report<sup>1</sup>. We pride ourselves on delivering clean energy solution for a greener world, and to work with our customers to achieve their decarbonisation goals. The use of energy efficiently and intelligently then inherently becomes part of our overall strategy.

To that end we are in favour of the EEOS and what it is looking to achieve. We do however believe that it should take a holistic view of the use of energy and the decarbonisation targets set out in the Clean Energy Package (CEP), the Climate Action Plan (CAP) and the Programme for Government. Whereas Article 7 of

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<sup>1</sup> <https://www.cru.ie/wp-content/uploads/2020/12/CRU20173-Energy-and-Water-Monitoring-Report-for-H1-2020-1.pdf>

the Energy Efficiency Directive 2012/27 does not make a distinction between energy sources, such as renewables or coal for instance, the introduction of the concept of thresholds in the EEOS does provide the opportunity to tie in the Energy Efficiency Directive, CEP, CAP and Programme for Government neatly.

We think that the obligation and free allowance threshold provide a sensible solution for new entrants to the EEOS. We however believe that if the allowances were tied to renewable energy provided by Suppliers it would be a means to integrate the other targets in terms of renewable energy set out by Government and Europe.

We have been one of the leaders in the Corporate Power Purchase Agreement (CPPA) market and we expect that tying the thresholds into renewable energy will be a further means to encourage this market to develop and prosper as opposed to creating barriers for it to flourish.

The EEOS also creates the opportunity to use our energy more effectively and intelligently. In 2019 over 710 GWh of renewable electricity, enough to power Galway city, was lost due to dispatch down instructions<sup>2</sup>. Companies such as Energy Cloud are looking to allocate this lost energy to those in energy poor circumstances. The EEOS should have allowance for the use of smart, renewable energy in this way to help reach efficiency targets and support those most in need in society. Innovative use of clean energy should be rewarded under EEOS.

### **Sub-sectoral targets**

While we note the proposed split between Alternative Measures and the EEOS has changed we do not believe that the increased onus on EEOS whereby the split has gone from 50 to 60% is fair or justified. This unjustified split is further exacerbated with the target changing from Primary to Final energy.

In the case of Transport inclusion in the EEOS it is a welcomed and sensible decision. Transport is a substantial part of the energy mix but the fact that this significant sector does not have sub-sectoral targets in Non-Residential, Residential and Energy Poor does not appear fair or equitable. Many Suppliers such as Brookfield Renewable Ireland do not work in the Residential sector but are expected to meet targets within other areas. Transport should be no different. The overall target for Transport should be reflective of the Final Energy consumption which we estimate to be closer to 45% than the proposed 40% in the consultation paper.

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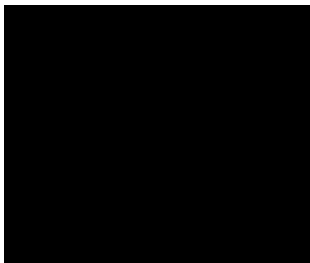
<sup>2</sup> <https://windenergyireland.com/images/files/iwea-saving-power-report.pdf>

## Conclusion

Brookfield Renewable Ireland welcomes this opportunity to respond to the consultation on EEOS. We are committed to delivering clean energy solutions for a greener world. To that end we believe that the EEOS can be used to achieve this goal, but it must have a holistic view of the energy mix and the decarbonisation targets that we are tasked to deliver. The scheme should be designed with flexibility in mind and to reward innovation in smart ways to use green energy. It must encourage Suppliers to meet other Government targets from the Programme for Government, Climate Action Plan and the Clean Energy Package.

Brookfield Renewable Ireland trusts that this letter will be given due consideration by your Department during the consultation period.

Yours sincerely,



Head of Portfolio & Risk

**Brookfield Renewable Ireland Ltd.**

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[www.brookfieldrenewable.com](http://www.brookfieldrenewable.com)

