

Response Information

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Is Test: No

IP Address: [REDACTED]

Login Info

User Name: AnonymousRespondent

Invitee:

Response Details

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1 - Name

[REDACTED]

2 - Company

KORE

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

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 has worked well in the past.

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.

Many of these distributors are operating at smaller scale and it will be difficult to capture them in the threshold. Some creative thinking required. Imports from Northern Ireland have proved to be a problem in the past in this area especially in the northern half of the country .

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.

Worked well in the past scheme

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 seems to be what is required and used in Europe and leaves targets clearer.

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

15 - Please provide reasons to support your response.

The threshold may mean more smaller companies just below the threshold in order to escape the obligation.

16 - Question 3.5

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

Yes

17 - Please provide reasons to support your response.

I believe the targets for each company should be set and displayed on dcae or epa site. Progress displayed quarterly against projected targets. Having no players with a monopoly on the delivery of the obligation.

Companies can be given a name : company x company y Company Z etc

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)?

Don't know / No Strong opinion

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

23 - Please provide reasons to support your response.

Worked well and will be needed to achieve our climate action plan goals and targets

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.

The BEC BEH NHS could be good delivery schemes for this sector also if the right funding mix/bonus is retained.

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

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?

Yes

29 - Please provide reasons to support your response.

I feel it should be reviewed yearly and increased where necessary. Maybe increase minimum to 20%

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?

Yes

31 - Please provide reasons to support your response.

This helps the most vulnerable in society.

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.

It seems like a reduction on the previous sector delivery target

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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

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.

What worked in the old scheme should be carried forward.

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?

No

41 - Please provide reasons to support your response.

Targets should be based on sales

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.

Yes has worked fairly in the past

44 - Question 7.4

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

No

45 - It has worked well in the past

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 seems fair and keeps things on a level keel throughout the 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?

Yes

51 - Please provide reasons to support your response.

Through an auction perhaps.

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

55 - Please provide reasons to support your response.

This could lead to one company having a monopoly on credits and their delivery.

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.

To allow a % to purchased to help with delivery of targets.

60 - Question 7.12

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

No

61 - Please provide reasons to support your response.

20% of target so targets are taken really seriously and the market evolves to help deliver on our climate action plan.

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?

Yes

63 - This publishing of buyout price has worked well in the past and acts like a carrot and stick. The scheme needs transparency for everyone.

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

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?

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?

Yes

73 - I am not sure the the new fuel poor classification is correct, the Ber E may limit the peoples involvement and cause confusion on schemes and lead to market manipulation to make houses fit. People in rented accomadation should be a target of fuel poor schemes.

75 - Please provide reasons to support your response.

Every year so we are kept up to date and meeting our climate action plan

76 - Question 8.3

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

Don't know / No Strong opinion

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 - Take a similar approach to how the UK report on their progress towards meeting targets. Their reporting is very good.

80 - Question 8.5

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

Yes

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.

The more info in the public domain the more people are aware of schemes and progress towards targets and our climate action plan which is going to be hard to deliver

87 - Please provide reasons to support your response.

Maybe like food labeling , a fat content, sugar content etc could be attached to bills of utility companies showing progress towards targets