

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

Overy & Associates

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;
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)?

Don't know / No Strong opinion

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)?

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)?

Don't know / No Strong opinion

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?

Don't know / No Strong opinion

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?

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?

Don't know / No Strong opinion

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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?

Don't know / No Strong opinion

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

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?

No

47 - Please provide reasons to support your response.

They should only be given 5% flexibility total, i.e. if 95% is achieved in year 1, at least 100% must be achieved in year 2. If 97% is achieved in year 1, 98% would be acceptable in year 2 provided year 3 is at least 100%.

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?

No

52 - Question 7.8

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

Yes

53 - It might be acceptable if the exchange was contained in their annual report e.g. we met our EEOS obligations, but had to buy our way out of trouble.

54 - Question 7.9

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

Yes

55 - Please provide reasons to support your response.

As 7.8.

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.

Yes, provided the buyout is declared in their annual report, and the buy-out is costed at a premium to obtaining the credits themselves.

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

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 - €500/tonne of carbon, to send a strong message that they should meet targets. The capital cost of making savings can be very high per tonne of carbon, and we need the savings now.

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

- 69 - Please provide reasons to support your response.

SEAI via its various programmes has a good handle on the Capex of avoiding a tonne of carbon emissions. This data should be used to derive a cost per tonne of CO₂ based on perhaps a 3 year payback on carbon, primary energy presently on average having a carbon content of perhaps 0.2kg CO₂/ kWh PE including the renewable content of electricity. The figure so derived will probably be of the order of €500/tonne, perhaps much more.

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 - It should not be possible to get credits for new buildings e.g. a new A2 rated office building where Part L only requires, say, A3. Market forces are probably demanding the A2.

Where IPMVP Option D is used, calibrated models must meet some degree of accuracy of calibration to an internationally recognised standard such as ASHRAE Guideline 14 of 2014. It is not good enough for a model to be within, say, 10% of reporting period actual energy consumption on an annual basis.

- 75 - Please provide reasons to support your response.

3 years, so it can be adjusted twice between now and 2030, i.e. in 2024 and 2027.

76 - Question 8.3

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

Yes

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 - It should be done on a cost per kg of CO₂ saved.

80 - Question 8.5

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

Don't know / No Strong opinion

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 - Industrial projects are too specific and varied to provide useful information. Every industrial project is unique. Commercial and domestic projects could be reported by technology, although SEAI should already have a good handle of costs in this field.

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.

Consumers should be given an annual carbon budget set on 7% reduction per year to 2030, and told on each utility bill how much of their budget is used up. However, this would need also including on airline ticket purchases, and petrol/diesel. At least then they would know, my budget is 10 tonnes and I spent 1 tonne on electricity and 1 tonne on heating oil.

87 - Please provide reasons to support your response.

On utility bills.