

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

NovoGrid Ltd

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.

When facing a systemic challenge like climate change, a piecemeal approach will never work

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

No

11 - Please provide reasons to support your response.

Excluding the Distribution & Transmission System Operators is a mistake.

Our DSO & TSO could contribute up to 10% of our EED annual targets by minimising grid energy losses at a negative abatement cost in a timescale of months.

Energy Efficiency Directive Rationale

Article 7.4(c) of the EED states member states **may** "count towards the amount of required energy savings, energy savings achieved in the energy transformation, distribution and transmission sectors"

That this option is categorically included is because there is an enormous opportunity available. That it is discretionary is to facilitate member states with poor grid infrastructure.

Ireland is a member with very good grid infrastructure and should use this as an opportunity to show leadership, as Minister Ryan rightly repeats in his public statements.

No Analysis or Quantification of Opportunity Completed

In the EEOS report spanning 130 pages, the total analysis given to the grid energy efficiency opportunity is 3 lines.

I repeat it in full here "*There are also changes in the capacity requirements and level of losses faced by transmission and distribution networks. To estimate this effect for electricity (including any impact on reserve requirements) would require dispatch and power flow modelling of the Integrated Single Electricity Market (I-SEM) of the island of Ireland. This has not been undertaken as part of this study, but any impact is expected to be minor as compared to other benefits discussed here.*"

1) Dispatch & power flow modelling was not completed. Any electrical engineering department in our national universities can complete this modelling. Or the Electric Power Research Institute, an independent, internationally recognised body, located at UCD's Belfield campus would also be more than capable of completing the necessary analysis.

2) "Impact is expected to be minor" is presumptive and woefully incorrect.

A SEAI funded report, RDD44 - Electrical Network Efficiency Improvement, detailed how 33.5 GWh of grid energy losses can be saved by the smart operation of Ireland's distribution connected wind farms.

Our annual target is 650GWh, this would account for over 5% of Ireland's annual target, while saving the Irish energy consumer €2.2 million per year in reduced energy system costs.

This is just one technology, on one grid type.

Foreign Examples of Grid Energy Efficiency

The UK is the obvious place to look. It has a similar grid structure and operation.

All UK network operators are required to produce Losses Strategy Documents. This is driven by the UK implementing the EED.

Example from [Scottish Power Energy Networks](#)

Note the energy efficiency savings of 54 GWh and 103 GWh for North Wales & Southern Scotland regions respectively. Further evidence that grid energy efficiency is not minor.

12 - Question 3.3

Do you agree with our proposal to set the obligation threshold in terms of annual final energy sales volume (GWh)?

No

13 - Please provide reasons to support your response.

Final energy sales volume excludes the positive impact of energy efficiency measures on the distribution & transmission grids

It is not a suitable measure as energy consumers transform into energy prosumers and will cause misalignment with other policy areas including micro-generation, energy storage and electric vehicle to grid technologies

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

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?

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?

Yes

43 - Please provide reasons to support your response.

Often grid energy losses arise as a result of facilitation of actions of 3rd parties by DSO/TSOs rather than direct action by the DSO/TSOs themselves

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.

Variance will always occur and should be allowed for

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?

Don't know / No Strong opinion

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?

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

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?

No

75 - Please provide reasons to support your response.

Annually or you will be overtaken by technological changes

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 - More detail the better for validation and use in research

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?

Don't know / No Strong opinion

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