

## 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

Solas Holdings

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. This allows for an even spread over each sector according to their use. The scheme should provide for revisions on a periodical basis.

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.

If a party is inputting above the agreed threshold then they should be considered as obligated

- 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.

If a party is inputting above the agreed threshold then they should be considered as obligated

- 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.

If you bring in non retail parties, this may distort the price to the end consumer i.e the householder. E.g ESB networks provide transmission services. If they are obligated under the EEOS this will have an effect on the final price to the consumer.

- 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?

Yes

- 15 - Please provide reasons to support your response.

A 400 GWh target sounds reasonable for suppliers, however there should be a methodology to allow adjustment where a supplier either over achieves or under achieves on their target. Maybe a three year average methodology.

- 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?

No

- 19 - Please provide reasons to support your response.

At present the split is half and half. Energy credits and associated projects are challenging enough even in their present state. Making the scheme tighter and increasing the burden on EEOS will present very significant challenges.

- 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)?

No

**21** - Please provide reasons to support your response.

Transport accounts for a very large portion of final energy use. This use should be looked at and that proportion allocated to this sector.

**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.

Obligated parties should be allowed deliver through any sector. this would allow for OB's to be more creative and think outside the box. While residential will make up the vast bulk of their target, it would be unfair to limit their scope. Delivery should be equal between all sectors and the opportunity for innovation should not be hampered.

**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.

Having worked directly within this space for a number of years, energy poor are the hardest and most expensive areas to deliver in. The costs associated are extremely high in comparison to the residential sector. 5% at present is the upper limit that can be delivered cost effectively. It would bring the new costs as proposed outside "a real" cost savings benefit.

**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.

Transport should have the same playing field as all other Obligated parties.

**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.

So long as it spread between all parties involved on an equal and fair transparent methodology. Aagin - level playing field

**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.**

See comments in 5.2 above

**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.**

Sub-targets need to be equal across all sectors.

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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)?

No

**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.**

We have been in the energy space for over 20 years. Our vast experience in dealing with the consumer on the ground has always found that they are very price conscious. E.g if the cost of the grant/supplement is less than or near the "extras" that need to be carried out to attain the grant/supplement, then the installer or homeowner will not justify the spend. Homeowners do not carry out multiple measures in one go. This is mainly due to budgets and disturbance factors. While it should be encouraged to carry out multiple measures the facts are this is in not the case. If you force a consumer to carry out multiple measures to achieve a financial benefit, the bottom line is the works will be carried outside of any scheme and thereby go unrecorded. The cost of carrying out a BER far out-weights the benefits. So consumers will get works done outside of any scheme. Also with the number of measures carried out under the scheme, there is a massive gulf in the number of BER assessors and the amount of work needed under the proposal. Consumers and installers will just opt out in mass. This was the case when the grants were reduced in circa 2012 and stricter requirements were put on installers. Consumers, on experience want the work done "now: as soon as they have made the purchase decision. If a BER assessor is needed, this could delay the work job by months at the current rate. Installers and consumers will not wait this period. This will lead to a mass amount of works being carried out yet being unrecorded. It is essential that single measures are still valid and recorded under the scheme. As stated, our vast on the ground experience has shown that budgets will not allow for a whole house refit. It make take two or three Refurbs to get a property to a higher rating. this may be spread over a number of years or owners. A vast proportion of the potential recorded savings will now be missed out on if single measure methodology is not valid.

It is vital that a table of values is retained. Consumers will not carry out work based on a projected or assumed return at a later date. Clarity is key.

**36 - Question 6.2**

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

No

**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 poor is not defined by the rating on the property and never should be. Energy poverty by its very nature is the individual who unfortunately is in that position. If Department try to reinvent the definition of fuel poor, then again a vast amount of works will not get carried out. The vast majority of fuel poor are residing in either publicly owned or housing association accommodation. These organisations are very dependent on the funding through EEOS and other schemes. However, our experience shows, all upgrades are carried out with very tight and strict budgets. These budgets take into account the value of Energy credits. Taking these properties/ people out of the energy poor definition will limit the added value that the EEOS brings and as a direct result limit the extra upgrades that can be carried out.

**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?

No

**39 -** Please provide reasons to support your response.

Covid has shown that the landscape can change overnight. Consumer choice, trends, financial incentives etc can also effect this. Obligated parties should not be limited. This also curbs an Obligated party to be innovative in their delivery method.

**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.

A realistic approach has to be taken in the current climate.

**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 is crucial for Obligated parties. Again this encourages innovation which will lead to new practices and better deliverability of targets.

**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.**

Flexibility must be given in all aspects of any scheme. This is a marathon not a sprint.

**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.**

Again. Look at the innovation that can be developed when parties are in communication.

**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?

Yes

**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.**

Not all OP's have an ability to deliver in certain sectors. Sometimes its better to concentrate where your strengths are.

**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.

see 7.11

**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?

No

**67** - Please provide reasons to support your response.

It should be either a penalty or fine. You cant have your cake and eat it.

**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** - The scheme should be as consumer friendly as possible in order to get greater take up. We believe better integration with key manufactures and suppliers.g heat pump manufactures, boiler manufactures, larger window manufactures etc including the merchant base would capture presently unrecorded data. If theses bodies were compelled to report and record this would filter to the end user. OP's could then team with manufacturers and offer further incentives to to the end user. All this can be very easily implemented with model technology such as an app. E.g ABC Heat pumps supply 2000 units through its installer/merchant base. ABC should be made record each and every unit. If its a new build , then that is not of concern to the EEOS. If it is a retro fit, then ABC can track and trace this install. The installer or merchant must provide the relevant data e.g mprn, certs etc to validate the install. We developed an app that does this exact thing in a very user friendly way. A

reporting system could be made mandatory on all retro fits carried out. This now puts the onus on the installer and or manufacturer. It would capture all the unrecorded works and add greatly to the overall EEOS target.

**75** - Please provide reasons to support your response.

Every three years would be a fair review period.

**76** - Question 8.3

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

No

**77** - Please provide reasons to support your response.

To what benefit is this to SEAI. They are not a commercial entity.

**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** - The more data that is required the more cost involved. This lessens the ability of an OP to spend on implementation of savings and schemes.

**80** - Question 8.5

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

No

**81** - Please provide reasons to support your response.

Again, each Op is a commercial body or entity. OP's business is there business and there should be no relevance to cost data.

**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?

No

**85** - Please provide reasons to support your response.

The consumer is confused enough. How many consumers know what a KWh is? Better general dissemination of information through public forums, consumer tv programmes e.g Room to improve ect bring far more bank for buck than trying to "inform" a consumer about savings. The vast majority of consumers look at one thing on a bill. The bottom line.

**87** - Please provide reasons to support your response.

See above



