

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

Smart M Power Co

3 - Email

smart@mpower.ie

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.

failure to reach targets in the recent pass. little sign of accelerated catch-up. the need to ensure the energy market players and system operators engage seriously with challenges now facing Ireland to reach the 55% reduction of CO2 Emissions by 2030. A target that seems impossible to achieve unless the obligations cover these main players

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

8 - b) of the eligible parties in the solid fuel market, all entities, including all distributors and suppliers operating in Ireland;

Yes

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.

all operators and players in the gas and electricity system and markets must be treated equally with all other parties otherwise obligated. Ireland needs to recover speed and effectiveness fast to achieve its targets

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

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

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?

Yes

19 - Please provide reasons to support your response.

realistic targets must be set which enable ireland catchup with targets agreed under international {EU} agreement

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)?

Yes

21 - Please provide reasons to support your response.

transport needs clear target and robust goals

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.

the residential market must play its part fairly plus extra measures are needed to meet new obligations set

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)?

No

25 - Please provide reasons to support your response.

the energy poor are already at breaking point ... clear definitions and measures to releave energy poverty are needed ... then the burden can be spread

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

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?

No

31 - Please provide reasons to support your response.

see 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?

Yes

33 - Please provide reasons to support your response.

well reasoned

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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)?

Yes

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.

maxim push is essential .. but not from energy poor

36 - Question 6.2

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

No

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?

Yes

41 - Please provide reasons to support your response.

achievement must attempt to go beyond goal

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?

No

44 - Question 7.4

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

No

45 - not sufficiently informed to suggest ..

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.

in the end the goals must be met but interim freedom of reasonable level might be wise

48 - Question 7.6

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

No

49 - as above

50 - Question 7.7

Do you agree that obligated parties should be allowed to exchange validated credits bilaterally?

No

51 - Please provide reasons to support your response.

this needs active regulation and careful monitoring to avoid perverse transfers

52 - Question 7.8

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

No

53 - as above

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

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.

it might be an interim measure necessary but funds generated should be invested in clean energy community advancement for energy stability purposes

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?

No

67 - Please provide reasons to support your response.

as stated above

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.

after 3 years

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?

No

80 - Question 8.5

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

Yes

81 - Please provide reasons to support your response.

transparency - trust redemption

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

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