

Response Information

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User Name: AnonymousRespondent
Invitee:

Response Details

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1 - Name

[REDACTED]

2 - Company

[REDACTED]

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.

We support the proposal that the EEOS targets are shared across all the energy suppliers that contribute to final energy consumption. The inclusion of transport is welcomed; however, this transport target should be allocated sub sector targets particularly the delivery of energy poor targets. We believe that more obligated parties being targeted with delivering energy poor targets will result in a corresponding increase in opportunity for households to be removed from fuel poverty.

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.

Yes, we agree that only liquid fuel importers operating in Ireland should be eligible .

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.

Yes , we agree that all eligible parties in the solid fuel marketing are included in the EEOS.

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.

Yes we agree that retail energy supply companies should be eligible but DSOs such as GNI who may supply sizeable amounts of CNG to the market should also be considered to be obligated. GNI could bring innovation to the delivery of the scheme and provide additional options of energy efficiency measures for customers.

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.

Yes, we agree with the setting of the obligation threshold in terms of the annual final energy sales volume.

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.

Yes, we agree with setting the obligation threshold at final energy sales of 400GWh with the introduction of a free allowance for existing and new obligated parties. The lowering of the threshold will bring more parties into the scheme which will provide more innovation in delivery of credits and more options for customers to engage in energy efficiency measures. The inclusion of a free allowance is a vitally important measure to ensure that new entrants and smaller obligated parties are not unduly commercially impacted by participation in the scheme. We strongly agree with the introduction of the free allowance.

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.

No we do not agree with the proposal that 60% of the Article 7 target is to be met by the EEOS. The previous 50/50 split between EEOS and alternative measures allowed for the most cost efficient delivery of the scheme. The ECA report does not provide a strong justification as to the increased target for the EEOS, considering stricter additionality requirements and alignment with the Climate Action Plan. Additional alternative measures should be considered.

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.

Yes we agree with allocating target to transport. We support the need to address fuel poverty in society. We believe that this should be shared across transport and non-transport participants. Our experience with our customers, a significant proportion of which are in fuel poverty is that there needs to be multiple affordable energy efficiency measures available. This can be facilitated by increasing the number of parties involved with delivering the credits. We believe that the cost of delivering energy efficiency measures in energy poor homes needs to be funded by government and should not burden this customer base with increased debt.

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.

Yes, but we would propose sub-targets for the Transport Sales Target as well. We feel that one of their sub-targets should relate to residential and energy poverty in line with the ambition of the CAP.

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.

Yes, but we do not agree with the narrow definition of fuel poor which limits the opportunity for genuine fuel poor households to be removed from fuel poverty. We believe that the cost of delivering energy efficiency measures in energy poor homes needs to be funded by government and should not burden this customer base with increased debt.

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

27 - Please provide reasons to support your response.

Yes we agree that a portion of the EEOS target is not met by measures in the transport sector.

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.

Yes, but there should be a corresponding reduction in energy poverty target.

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.

We support the need to address fuel poverty in society. We believe that this should be shared across transport and non-transport participants. Our experience with our customers, a significant proportion of which are in fuel poverty is that there needs to be multiple affordable energy efficiency measures available. This can be facilitated by increasing the number of parties involved with delivering the credits. We believe that the cost of delivering energy efficiency measures in energy poor homes needs to be funded by government and should not burden this customer base with increased debt.

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.

No while we welcome a decrease in the residential target of 16.75% from 20%, we do not support an increase in 8.25% of residential and energy poor, which is increased from the current scheme at 5%.

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.

We support the flexibility to put the property on a B2 pathway, however more affordable energy efficiency measures should be available for customers who are unable to afford expensive deep retrofits. We also do not support that a BER assessment and report is required for every measure as this will prove expensive and may act as a barrier customers availing of more affordable energy efficiency measures or in a staged basis over a number of years.

36 - Question 6.2

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

Yes

- 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.

The narrowing of the definition of energy poverty to properties with a BER rating of E1 or worse, removes genuine energy poor households that would meet the criteria if based on income level, employment status and energy costs. We strongly disagree with this proposal as it limits the delivery of energy efficiency measures in energy poor households that require the measures the most.

We strongly believe that the option of delivering savings via deemed credits should be retained. This allows flexibility in the delivery of credits and ensures that customers have a wider selection of offerings from which they can choose one they can afford. This mechanism has allowed the delivery of effective efficiency measures to budget constrained customers without burdening them with debt. Furthermore removing more affordable measures for customers is likely to discriminate against customers unable to afford deep retrofit measures. Our experience with our customers is that the cost of the BER alone could become a barrier for them to engage with the scheme

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

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

We support the target being set as an additive target including 2021 as this ensures that Ireland is on track in delivering its targets and not creating a shortfall in later years. Retention of the facility to carry over credits should continue in the new scheme

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.

No, we agree that the calculation is set against target and not delivery as this will prevent a shortfall of credits and the risk that the Article 7 target is not met by Ireland.

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.

Agree, this is vital for a successful scheme and allows flexibility in delivery 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.

Agree, this allows for flexibility within 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.

Yes, obligated parties should be allowed to exchange validated credits bilaterally. This mechanism allows parties to deliver savings in the sectors in which they have expertise. It eases the burden on all obligated parties by allowing the trading of efficiently generated credits. It also removes a false threshold whereby obligated parties would otherwise stop serving a customer base once their target has been reached.

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

55 - Please provide reasons to support your response.

Yes Obligated parties should be allowed to trade all or part if their targets. This mechanism allows parties to deliver savings in the sectors in which they have expertise. It eases the burden on all obligated parties by allowing the trading of efficiently generated credits. It also removes a false threshold whereby obligated parties would otherwise stop serving a customer base once their target has been reached.

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, there should be a buy-out mechanism in place for the 2021-30 EEOS. Transparency is essential in setting the buy out costs, the SEAI cost of the scheme should form the basis of setting it. We support an increase in the buyout level, as this fund will be used by SEAI to deliver the credits instead of the obligated party ensuring Ireland meets its Article 7 target with the minimal cost to society.

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.

No, we support an increase in the buyout level, as this fund will be used by SEAI to deliver the credits instead of the obligated party ensuring Ireland meets its Article 7 target with the minimal cost to society.

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 - The calculation for setting the buy out price should be transparent and a reflection of the real cost to deliver the savings.

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.

We support a maximum penalty but the mitigating factors such as challenges outside the control of an obligated party must also be considered when setting the penalty. Transparency and proportionality are essential in setting the penalty so that it is not unnecessarily punitive

69 - Please provide reasons to support your response.

Transparency and proportionality are essential in setting the penalty so that it is not unnecessarily punitive.

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 - Inclusion of affordable measures in addition to deep retrofits for customers with limited budgets.

75 - Please provide reasons to support your response.

Agree with more frequent review of 2 years

76 - Question 8.3

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

Yes

77 - Please provide reasons to support your response.

Provides customers with transparency of the cost in delivering energy efficiency measures.

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 - Not onerous reporting for OPs minimal data to be provided focus on the cost per credit.

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?

Yes

83 - Anonymity of OPs would need to be guaranteed.

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.

No, not all Obligated parties provide customers with bills. There are already existing regulatory requirements regarding the provision of information on consumers' bills by electricity and gas suppliers. Supplier handbook already mandates such requirements.

87 - Please provide reasons to support your response.

We do not support additional requirements on suppliers to provide information to customers, this could be communicated by SEAI/DECC.