

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

Tom O'Callaghan Energy Consultant

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, as much scope should be included here in terms of including all main energy markets in Ireland.

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;

Don't know / No strong opinion

9 - Please provide reasons to support your response.

This is more difficult to agree with or implement as there are a wide number of retailers who supply into these markets and have minimal capacity or interest in also in being an OP. This may need to be based on thresholds/limit of energy sales and/or exclusive to energy providers.

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.

Include up the supply chain also in the case of electricity.

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 and this worked well in 2014-2020 also.

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

15 - Please provide reasons to support your response.

No opinion on this as this depends on the wider structure and definition scope of the programme.

16 - Question 3.5

Do you wish to provide any specific comments in relation to the target setting approach?

Yes

17 - Please provide reasons to support your response.

This is important and should not be overly complex. There should be minimum scope for challenge in this area. EEOS programme was based on percentage market share in preceding year.

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.

Absolutely yes. The ECA study for SEAI also suggests that AM can only deliver 40% so EEOS must deliver the balance of 60%.

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

21 - Please provide reasons to support your response.

I would like to see some flexibility here as it the aggregate that matters and having mandatory included at sub-sector level may not be pragmatic. Certainly CAP have policy targets but would not enshrine in EED/EEOS as a mandatory requirement.

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.

Absolutely yes. The ECA study for SEAI also suggests this.

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.

NDs should be encouraged to contribute their share of OP finance to fund the EP

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.

This is similar to 4.2 above. I would like to see some flexibility here as it the aggregate that matters and having mandatory included at sub-sector level may not be pragmatic. Certainly CAP have policy targets but would not enshrine in EED/EEOS as a mandatory requirement.

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.

This sounds reasonable but will be influenced by national stimuli and not a target in isolation.

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.

This sounds reasonable but will be influenced by national stimuli and not a target in isolation.

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.

This sounds reasonable.

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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.

Yes, this sounds reasonable

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.

Societal responsibility here for weaker/vulnerable.

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.

This sounds reasonable and follows similar approach to EEOS 2014-2020 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?

Yes

41 - Please provide reasons to support your response.

2021 is un-usual so focus on same target by 2030 but dispersed from 2022 onwards and carry forward outturn from 2021 at actual. and not as target setting.

Target is overall to 2030 and remains unchanged. However, in reality, it's a nine year target with actual 2021 outturn deducted so yes, it should be 'actual' 2021 and not 'target' 2021.

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.

Yes though this means it's just financial incentive by OP. They should have materiality and additionality also.

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.

Yes, though it will prove very challenging to meet the targets as the low hanging fruit is gone at this stage.

However, LEU approach with ISO50001 continuous improvement may be factor here.

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; top up & spill approach or cfd approach.

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?

No

55 - Please provide reasons to support your response.

Would not recommend OP divesting its responsibility with 'all' though in 'part' - 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?

No

59 - Please provide reasons to support your response.

Its opt-out by a form of tax; not the intent here.

60 - Question 7.12

Do you think that the buy-out cap should be set at a maximum of 30% of targets?

Yes

61 - Please provide reasons to support your response.

Ceiling is better though I don't like the opt-out options for OP.

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

63 - No, don't agree with buy-out as an option.

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?

Yes

67 - Please provide reasons to support your response.

Need to have a enforcement aspect along with clear attainable targets.

69 - Please provide reasons to support your response.

Not achieving 95% of its annual target and making no effort to purchase from another OP. Graded penalty mechanism and increasing penalties if persistent non-compliance.

70 - Question 7.17

Do you wish to provide any suggestions or comments in relation to any aspect of this proposal?

Yes

71 - The EEOS should be based on 2018 Directive though Ireland is also grappling CAP.

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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 EEOS should be based on 2018 Directive in direct response to the new Directive though Ireland is also grappling CAP.

75 - Please provide reasons to support your response.

Five years in knowledge that year 1 is not a good year with pandemic.

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.

Definitely.

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 - SEAI have well established EEOS system in place already for 2014-2020 programme so similar model would be appropriate here.

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.

Yes, no issues other than GDPR.

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 - Based entirely on policy targets and what is being achieved. Leave the detail to the parties involved.

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, Smart metering is the vehicle for this though also referred within EED as time of day tariffs

87 - Please provide reasons to support your response.

I think EEOs programme is not means of getting this information to users; utility have NSMP.