

Response Information

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Is Test: No

IP Address: [REDACTED]

Login Info

User Name: AnonymousRespondent

Invitee:

Response Details

Page 2

1 - Name

[REDACTED]

2 - Company

Building Insulation Energy Consultancy

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.

EEOS must cover all in the fossil fuel family

I feel the obligated parties should be obliged to hire a new category of professional based on the UK recognised 'Retrofit Coordinator' and other retrofit roles as set out under PAS2035.

<https://www.trustmark.org.uk/ourservices/pas-2035>

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 of the fossil fuel energy suppliers must be obligated across the supply chain.

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.

It's too easy to compile a set of accounts that will get underneath any threshold

Fossil fuel sales people are industrial polluters and should pay a license in the form of the EEOS at any level, In particular anyone importing fossil fuels from abroad must be heavily obliged, or ideally taxed, with a contribution ring fenced for community renewable energy projects.

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?

No

15 - Please provide reasons to support your response.

see above

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.

see above

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.

It should be 100%

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.

Again too easy to get around this with creative waffling.

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 - mainly because the BEH and NHR schemes are already well established, alongside the BEC schemes. But the methodology of calculating the savings should be more closely aligned across EEOS and all the schemes.

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

25 - Please provide reasons to support your response.

I think from a social policy point of view it's a nice idea but energy poor people are often difficult to deal with in terms of surveying and gaining access for inspections and BER surveys in my experience. I really feel it's not the energy suppliers job to take care of this cohort. Behavioural change would be far more effective here in terms of reducing emissions.

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 is one of the biggest polluters in the country.

Consequently we must achieve a mindset change.

However it's difficult to persuade people to use public transport when it's under invested and poorly provisioned.

Ringfence the money and invest in the rail and ethanol bus /hydrogen bus network

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?

No

29 -

Please provide reasons to support your response.

you should strategise and set the targets according to what's mostly achievable at cost optimal level

This is the law (EPBD)

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.

What's the basis of the target? You can't present a question like that without context.

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.

Again no objective basis presented for the splits, can't someone explain what the figures mean?

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)?

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.

See above.

If you want to consult with the public why not present the proposal in plain English and set out the implications or alternatives foregone?

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?

No

39 - Please provide reasons to support your response.

I'd rather a higher target be set at the start and keep the pressure on.

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.

This year is a disaster. Of course the delivery this year is going to be terrible when construction has been closed for 4 months. I can't believe this is a serious proposal!

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?

Don't know / No Strong opinion

43 - Please provide reasons to support your response.

I'd need to know more about their quality management systems, from what I hear in some EEOS parties, these are practically non-existing.

44 - Question 7.4

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

Yes

45 - see above

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.

A bit of flexibility is the hallmark of any successful collaborative process

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.

I don't see why not, but it does create a perverse hidden market. But perhaps it can be capped.

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.

Of course but maybe cap it.

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.

Yea why not. We can't all be insulation companies. And it's getting more complicated.

So long as the money is ring fenced to community energy/ renewable etc.

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.

What's the basis of the 30% figure? It should only be an option for those who consistently fail to deliver quality.

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?

Yes

71 - The main thing is that consumers should be protected

If there is a quality management system in place for the obligated party, modelled on PAS2035...

Page 4

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 - Base all retrofit design and coordination on PAS 2035

make sure the BER assessors/ technical checkers are fully independent and accredit them

Hyperactively incentivise deep and unusual measures - airtightness, renewable energy, community generation, set incentives for ABOVE AND BEYOND best practice, as opposed to box ticking.

75 - Please provide reasons to support your response.

Every couple of months.

Otherwise it's a wild west and a free for all

76 - Question 8.3

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

Don't know / No Strong opinion

77 - Please provide reasons to support your response.

Yea I don't know, This is strongly commercial information and could easily be abused or exploited

I really don't know about this.

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

79 - See above

Maybe to an independent judicial type of EEOS Commissioner

80 - Question 8.5

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

Don't know / No Strong opinion

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 - Should be published to Dáil committee

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

85 - Please provide reasons to support your response.

Always

87 - Please provide reasons to support your response.

In a more useable and user friendly format than either the current or proposed BER/Advisory report

Each homeowner/occupier should have an individual energy data portal.

All the relevant data should be shared and anonymised.