Dear Sir/ Madam,

I wish to make the following strategic observations about aspects of each of the six themes identified in the consultation documentation.

**Priority 1: Empowering Energy Citizens**

I note that the intended scope of this first consultation theme is awareness raising, reduction of domestic energy costs, reduction of emissions and the relationships between suppliers and consumers. I am disappointed that the main focus of this theme has not been directed towards **actual reduction by householders of their own energy consumption**. This theme fails to recognise the significant point that householders already have a level of empowerment around energy consumption. Many studies have shown the highly significant impact of educating citizens to minimise power consumption. There is merit in providing a state sponsored public education/ advertising project focussing on the areas where householders already have control, e.g lighting, water use, water heating, transportation, waste management etc.

What is most important is that this theme marked Priority 1 is actually given top priority and that reduction in energy consumption per head of population is given its own targets and a higher significance than any plans for rolling out additional energy capacity, even renewable energy capacity.

**Priority 2: Markets, Regulation and Prices.**

The brief of the Regulator should broaden to include long term assessments of the risk to energy pricing of excess construction of renewable energy capacity for export markets which may not require Irish power in the future. **The Regulator currently quantifies the applications and approvals for connection to the grid but without any connection of that data to the planning approval system or to any long term national strategy regarding exports.** CER has already approved sufficient wind energy capacity for meeting national renewable energy needs but still continues to approve capacity over and above that amount. To continue approving capacity on the strength of corporate ambitions to export wind power creates confusion in the market and false expectation amongst developers. Unfortunately in this situation oversupply of capacity does not equate to lower consumer costs. Oversupply of energy capacity will result in costly and perhaps unnecessary expansion of the national grid and significant challenges for the rural landscape and tourism.
Priority 3: Planning and Implementing Essential Energy Infrastructure

As it currently stands there is no national ‘count’ of the renewable energy capacity that has already been fully permitted through both CER and the planning authorities to the point that it is ready for construction, finance permitting. What this means is that local authority planners and An Bord Pleanala are working in a vacuum and continuing to permit renewable energy developments which may not be needed. Renewable energy has an important role to play in our national strategy but over supply of renewable energy, in the absence of mature energy storage technologies, would be uneconomic, inefficient and simply foolish.

Before any further approvals are granted, there needs to be a full assessment of the remaining need for renewable energy projects. This could be part of a National Renewable Energy Strategy as recommended by the Irish Academy of Engineering. Before EirGrid and wind developers proceed further with development plans there needs to be a National Landscape Plan in place, as recommended by the Heritage Council and An Bord Pleanala.

There also needs to be a complete review and recalculation of Ireland's renewable energy targets to ensure that this country is not over reaching its true targets at the expense of our landscape. There seems to be no logical reason why the UK is working to a 30% renewables target while Ireland has a 40% target.

Priority 4: Ensuring a Balanced and Secure Energy Mix

This theme should not be restricted to the narrow focus of imports v exports. A full cost benefit analysis of various options projected into the future is essential. Grid infrastructure is costly and the cost of installing and maintaining grid of a suitable strength to support a very high penetration of wind energy just may not prove to be the best economic or environmental option. The value of effective energy education with a focus on consumption should not be underestimated. Just as waste prevention is factored by the ESRI into waste generation growth rates, reduction in energy consumption must become a significant element in the calculation of future energy demand.

Priority 5: Putting the Energy System on a Sustainable Pathway

Again, this theme seems to be more focussed on creating additional energy capacity than reducing energy consumption. The lack of focus on the actual scientific quantification of the need for further renewable energy generation capacity is also worrying. The focus of this Green Paper exercise needs to be on quantifying where Ireland is now with regard to energy, including renewables, and where it needs to be in 2020 and 2030. Creating a series of ‘warm and fuzzy’ policies for widespread infrastructural development with no overarching evidence-based strategy related to actual energy need would do the Irish citizens a significant injustice. The planned cost of expanding the national grid to a level significantly beyond national needs is currently estimated at €3.2 billion. The country may be better served by redirecting a significant proportion of this budget into sustainably constructed housing.
Priority 6: Driving Economic Opportunity

The important point under this theme is the need to recognise that not all potential opportunities actually turn into opportunities. Ireland’s tourism industry is currently recovering from the effects of an oversupply of new hotels. Parts of Ireland’s rural landscape may never recover from the effects of inappropriately located housing developments that now lie idle as ghost estates. Much of the renewable energy ‘opportunity’ that is currently spoken of is related to export strategies. As yet no long term cost benefit analysis has been published to support the theory that Britain and Europe need excess renewable energy from Ireland. In fact the Irish Academy of Engineering as recently as 2012 warned against such an assumption. To avoid unnecessary over-construction of pylons and wind turbines (onshore and offshore) there needs to be an open conversation with the Irish people about strategies for energy export, accompanied by an independently prepared cost benefit analysis and business model.

Earlier this year thousands of Irish people took to the streets of Dublin to protest about the nature and extent of wind energy and pylon development proposals in Ireland. I was amongst that number. There is an opportunity now to have an informed and open public debate about these issues.

I look forward to further consultation phases and other engagement on this important matter over the coming months.

Yours sincerely,

Anne Ferris TD

Labour TD for Wicklow and East Carlow

Vice Chair of the Oireachtas Committee on Justice, Defence and Equality