Submission to DCCAE NECP
Initial Consultation

3CEA Submission with reference to consultation documents issued by the Department of Communication, Climate Action and Environment

TO: NECP INITIAL CONSULTATION, STRATEGIC ENERGY POLICY DIVISION
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SUBMISSION TO DCCAE NECP INITIAL CONSULTATION

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Subject: Submission to DCCAE NECP Initial Consultation

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1.0 INTRODUCTION TO 3 COUNTIES ENERGY AGENCY

Acting as the trusted advisor to over 350,000 citizens in partnership with Community, SME and Industry since 2002.

Carlow & Kilkenny County Council in partnership with the County Development Companies (Leaders) were instrumental in setting up the Carlow Kilkenny Energy Agency under the SAVE programme in 2002. In 2017 on the back of the success of the 2 County initiative, Wexford County joined the Carlow Kilkenny Energy Agency to become the 3 Counties Energy Agency. This independent Regional Energy Agency on whose board the 3 local authorities with both Executive and Elected representation, leader representative with the addition of strategic energy specific directors in recent years, has overseen the verifiable delivery of energy efficiency across the 3 counties of Carlow Kilkenny and Wexford through its’ executive of:
Figure 1 Growth to 14 staff
Figure 2 Achievements as a local actor in past 5 years

1.1 **MEASURED AND VERIFIED 2013-2018:**

- €32,000,000 energy project investment across
  - SME
  - Residential
  - Commercial Large industry
  - Community

- 217GWh of Energy Savings since 2013 through SEAI grants under BEC 2013 to 2018

- €15,000,000 of avoided energy expenditure in the 3 counties region
• 12 actioned SEC’s established under SEC in Carlow amongst national total of 227. On a population basis Carlow represents 5% of the nation’s SECS amongst 2% of the nation’s population.

1.2 **ACTIONABLE AND SCALABLE PLANS:**

• Climate action fund selection to tackle transport savings of 32GWh as the only independent Company amongst 7 selected from 98 applicants to the programme in 2018, delivering €4.6m smart investment and achieving €1m fuel savings per annum.

• 3 County approach to fuel poor housing retrofit leading to ambitious deep retrofit of 12,000 homes of fuel poverty tenants by 2025.

• Partnership with Large industry energy users to deliver local energy savings through salary incentive, green finance and energy credit rebates to home owners engaged with large industry in that community.

• Multiple Sustainable Energy Communities will be delivered through real action rather than planned.

• Planned €175m cumulative energy project investment amongst 6% of the population by 2030.

• Partnership with industry & research as the market facing conduit to accelerate the integration of TRL levels 3,4 and 5 disruptive technology into the energy sector across the 3-county region.

• Contributing to facilitation and leveraging 1200 sustainable energy jobs annually in the energy transition challenge.
2.0 **Review of NECP**

In summary the draft NECP as presented is disappointing, hard to follow, lacks structure and difficult to read. This is assumed to be explained by its draft status.

It is weak, lacks ambition and does not propose through its’ 4 tested scenarios to deliver any confidence that Ireland can alter its historic failure in climate and energy action and achieve its’ 2030 not to mind 2050 targets. This will be hampered by only outlining policy sanctioned by government in its present draft format.

2.1 **Section IV of the NECP. Administrative Structure of Implementing National Energy and Climate Policies**

Note reference to page 41.

Reference to some local authorities have renewable energy agencies.

Note is incorrect. They are not renewable energy agencies. They are local and regional energy agencies who are driving and delivering at:

- Local
- National
- EU projects

Through delivery at the local level since mid 1990’s.

**Examples Include**

1. Not for Project Companies Ltd by Guarantor
   a. CODEMA – City of Dublin Energy Agency – (15 staff)
   b. Tipperary Energy Agency – CLG (33 staff)
   c. 3 Counties Energy Agency – Carlow, Kilkenny and Wexford (14 staff)

2. Local Authority owned Energy Agencies
   a. Midlands Energy Agency – Laois - 1 Staff
   b. Mayo Energy Agency – Dormant - 0 Staff
   c. Waterford Energy Bureau – Active - 1 Staff
   d. Limerick Clare Energy Agency – Active - 1 Staff
3. Local Authority Energy Officers
   a. Cork City
   b. Cork County
   c. Louth
   d. Meath
   e. Monaghan
   f. Donegal
   g. Kerry
   h. etc

Correct note to state that there is a network of Energy Agencies across the country through the AIEA which is currently chaired by CODEMA, and previous to that, chaired by 3 Counties Energy Agency. www.aiea.ie

2.2 3CEA Specific Example

We at 3CEA as a local Energy Agency acting with the support of 3 local authorities, several LIEN and delivering 37 SEC members through the SEAI SEC program for Sustainable Energy Communities understand the significant gap and lack of:

1. Resource and capacity to impact the accelerated change needed at department level both in-house and within SEAI.
2. Resource at Regional Level
3. Resource at Local Level via Local Energy Agencies or Local Authorities run offices.

That resourcing of local, regional and national plan has been identified by the minister over recent months, thus delivering much firmer actions within this plan at:

- National
- Regional and
- Local levels.

3CEA see an urgent need to address and deliver the acceleration required to reverse the trend on Energy and Emissions nationally thus far. The 4 NECP scenarios presented, demonstrate little ambition and provide no hope for current or future citizens to prevent an inevitable decline into an uncompetitive, unattractive and laggard economy on the periphery of Europe post Brexit, where such support and loyalty will be difficult to curie from our remaining 26 EU partners. Europe have no sympathy for our lack of
action and the days of dependence on the ‘economic downturn’ excuse, are now a distant vision in the wing mirror of our thriving economy.

In the context that Ireland has understood austerity, it has dealt with it. It has planned its’ way through it in the previous (1988 and 2008) economic declines. To sleepwalk the state into an avoidable uncompetitive decline due to climate and energy inaction is not ethical but immoral.

Germany identified climate change as a challenge over 25 years ago and transitioned to deliver significant economic activity through low carbon enterprise and developments which have grown to impact global scale change. Ireland should seize this opportunity and change its’ direction now.

The cross-government plan on Climate Action should address this with its various committees, both elected and non-elected, reporting in March 2019 to identify that level of ambition and how it might be achieved and outlined in the plan.

The new minister has outlined the need for much greater ambition and understanding of the scale of the challenge ahead. The 3CEA would expect to see a greater level of ambition identified in advance of any submission to Europe before the end of this consultation process and final submission by year end 2019.
3.0 **Suggested Actions:**

To provide some input on the potential for change, the 3CEA promote the following actions for inclusion:

- Support and promote the development of an organic mix of renewable energies at all scales and all regions across all existing and emerging technologies.

- **Capacity Building e.g. Funding Local Authority Led Local Energy Agencies**
  
  - The 3CEA is highly exposed to funding shocks due to the lack of a long-term Climate and Energy Plan, resulting in an in-effective local authority-partnered delivery model which is entirely dependent on policy. 3CEA would like to see significant long-term funding included in this plan to support long term transition, utilising the locally trusted advisor model, at minimum on a regional level.
  
  - The adoption of the local energy agency opportunity in partnership with the Local Authority structures. Modelling it somewhat on Local Enterprise Offices with Local Energy and Climate Offices (Codema, Tipperary Energy Agency, Waterford Energy Bureau, 3 Counties Energy Agency et al as member of the AIEA).

- **DE carbonisation of the Electricity Grid through supports for**
  
  - Increased Renewable Penetration (reference the 70 by 30 as supported by Renewable Energy Ireland. The grouping of the Renewable Energy Associations on the island of Ireland under the Chair of Marie Donnelly.)
  
  - Increased support for low carbon Local Energy Supply chains to incentivise farmers to diversify into local energy supply to support the transition to a less import dependant energy system
  
  - District Heating in Towns and Villages sustaining rural jobs through rural energy supply supporting urban energy demand.
  
  - Distributed electricity generations support though
    - Domestic Export Tariffs of nett metering
    - SME and Farm Microgen supports
    - Increased supports to Renewable development with risk managed integration of communities to that generation mix.

- **Increased low interest mortgage finance for home renovation deep retrofit standards.**

- **The rapid reduction in all fossil fuels during our transition to 2030, 40 and 50 targets**
RES-E:

- RED 2 requires citizens to be permitted to participate in the energy transition. Make producing Consumers part of the solution, Microgeneration is critical part to winning the hearts and minds of communities. The clean energy package will mandate the DSO and TSO to incorporate distributed generation to the mix.
- RESS Auctions urgently presented and delivered followed by segregation of community in RESS auction 2 to give certainty for community involvement in RESS by 2021 and every auction thereafter.
- Match EirGrids stated ambition to have a significantly decarbonised grid by 2030. Ensure the DSO is aligned with this program.

RES-H

- Launch SSRH for Biomass
- Support BioGas/Bio Methane development and delivery through SSRH. Supports for certification of green gas via network or transported to demand location.
- Mandate urban centres and development to install centralised renewable heating networks, allowing citizens to produce both heat and electricity at a local level.
- Energy efficiency in heating.
- Provide a one-stop-shop at a county level, similar to what is already being provided by a number of energy agencies. Decrease the cost of this service through exchequer funding.

RES-T AND ENERGY EFFICIENCY IN TRANSPORT.

- Support Biomethane Production at rural level to support transport delivery.
- Integrate recommendations from exemplary studies such as I Route Mobility Planning (Integrated Urban & Rural Transport) across all rural counties. Successes here include the Kilkenny Transport Working Group, where mobility has been mapped and modelled to support bike schemes, electric, gas and hydrogen powered public transport modems.