



Public consultation on Transposition of Energy Efficiency Directive

Submission by Transition Kerry 15/11/2013

Transition Kerry is a community and voluntary group operating in communities across county Kerry. Our objective is to develop a greater degree of resilience in our local communities in response to the challenges of Peak Oil, Climate Change and continued global economic uncertainty.

We believe that with the right policies and supports local communities can play a more dynamic role in meeting Ireland's carbon and renewable energy targets and providing affordable, sustainable energy to power more resilient local and national economies.

We are working towards a more balanced objective through an integrated community-led approach in the areas of energy, food security, water efficiency, local economy, biodiversity, transport and waste, and we have sub-groups actively working locally in each of these areas.

Transition Kerry have recently commissioned a baseline energy audit and report on the current and future energy requirements of County Kerry (insert proper title), and we see major positive economic and environmental opportunities arising from the use of community-led energy programmes. This draft report is due to be finalised and published in early 2013. While not yet complete, we feel this work will be of value to DCENR in considering relevant issues, and we attach a synopsis presentation, which should be considered integral to our submission.

What is clear from our report is that communities in peripheral regions of Ireland are using too much imported energy and are paying far too much for this energy. What is also clear is that there is an abundance of renewable energy opportunities open to communities in Ireland, that are not being utilised due to regulatory, financial and structural barriers to development.

Rising energy costs are having a devastating knock on effect on local economies, already hit hard by the downturn, and make efforts at recovery and competitiveness more difficult. Measures that increase the financial efficiency of how we buy and trade in energy at local level are urgently required to address these economic impacts, and enable recovery to take place.

Previous renewable energy strategies have not incorporated community interests to the degree required to achieve community integration and adoption of efficiency measures. As a consequence, there is an increasing disconnect between energy policies and regulation, and the real needs of consumers, communities and the local economies in which they exist.

We welcome this consultation process as an excellent opportunity to correct this and to open a wider discussion about the role of communities in energy management in Ireland. We view that Ireland's energy markets need to be rebalanced, to better reflect the needs of consumers, and the need to conserve energy, money and jobs in our communities.

We present the following points to the Department for consideration:

1. Meaningful community involvement is critical to implementing energy efficiency measures on the ground, at all scales.

Energy efficiency policy measures must enable greater community involvement in energy decision making, energy marketing and production of renewable energy in Ireland. Efficiency measures from the 'ground up', at community level, must be supported by appropriate supports and policy measures from the 'top down' if they are to be adopted by consumers at optimum levels in our communities.

2. Community involvement is critical to ensuring that the transposition of the directive accurately reflects the needs of society, in particular local communities; and that the implementation of strategies and policies arising can be supported and adopted by communities at local level. To this end, Transition Kerry requests that DCENR establish a consultative panel to guide the transposition process, and ensure that the community sector is adequately and appropriately represented within this process.
3. Regulations and strategies arising from transposition of the directive should actively support the promotion of Community Energy Cooperatives and cooperative energy purchase schemes in Ireland, capable of operating at all scales and within all sectors within the Irish energy market. Such schemes would permit large savings to be made by consumers through application of economies of scale, and purchase of electricity for domestic consumption on Bulk Electricity Markets. Such schemes currently operate across Europe, most notably in Belgium, Holland and the UK, and have proved capable of yielding very significant savings to consumers in the towns and regions where they operate. Transition Kerry have recently initiated the process of developing similar measures in Co. Kerry.
4. Existing REFIT scheme tariffs do not accommodate small scale renewables development by consumers and community cooperatives. Additional measures are required to facilitate increased community scale generation and efficiency measures. A specific Community/cooperative renewable energy tariff should be established, to make project financing and entry into the market viable for community owned energy cooperatives. A suitable model 'COMFIT' exists in Nova Scotia, Canada, targeting community and cooperative based renewables development and this should be considered by the Department as a model for similar development in Ireland. There is also a need to improve the regulatory framework and costs structure to facilitate entry into the market of small generators and energy suppliers.

5. In the current energy climate, maximising energy consumer choice and market awareness must be paramount. To be most effective, energy efficiency awareness campaigns should have a strong community and voluntary basis and current programmes such as the an Taisce Green homes scheme should be further supported and expanded. Pay-as-you-save schemes should be encouraged in the energy market as an effective means for consumers to finance efficiency measures, however the regulatory framework for such schemes should be carefully examined to ensure that consumer interests are properly protected and benefits optimised.

Again we greatly welcome this consultation opportunity, and we are in a position to expand on any of the above points or points raised in the attached presentation should you so wish, we can be contacted using the details below.

On Behalf of Energy Group

Transition Kerry

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**c/o chairperson, Niamh Ní Dhúill,
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