

Micro Electricity Generation Association Of Ireland (MEGA)

NREAP CONSULTATION PROCESS

Submission To Department Of Energy, Communications and Natural
Resources

**Consultation by the Department of Communications, Energy &
Natural Resources on sub-section 4.2.4 of the NREAP template**

Submission, as requested by DECNR,
Submitted by email to Una Dixon at NREAP@dcenr.gov.ie

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NOTE:

Please note that all comments put forward by the Micro Electricity Generation Association Of Ireland (MEGA) are designed to be constructive and to re-inforce the current policy-forming framework which is developing the final text for Ireland’s National Renewable Energy Action Plan, NREAP.

The MEGA Methodology: In this consultation process MEGA will concentrate on specific areas where MEGA members have real experience and expertise. MEGA will first quote text from the sub-section. This will help to pinpoint the issue. Second, MEGA will make a submission below in this regard. This will be followed by a proposed text change. MEGA recognises that plans, once made, generally require some amendment during implementation and arising out of new knowledge but credibility is at the core of international collaboration, in this regard. Therefore, our NREAP must not only be detailed and comprehensive – it must also be credible and amenable to assessment. Ireland’s NREAP will sit together with the NREAPS (Renewable Energy Action Plans) of every single other country in the EU, available to the public and once published – final. It is of extreme importance that Ireland presents itself in this context as an intelligent, smart, forward-looking and business-like country. MEGA submission, therefore, are designed, in this context, to help achieve these ends.

Summary Of Changes Requested By MEGA – Item 1 of 2

ITEM 1

Quote 1 from NREAP Sub-section 4.2.4

“(d) Please indicate how information is made available on supporting measures for using renewable energy sources in electricity, heating and cooling and in transport to all relevant actors (consumers, builders, installers, architects, suppliers of relevant equipment and vehicles)

SEAI is actively involved in providing information and advice on supporting measures for renewable energy sources to all relevant stakeholders

Information on the schemes is made available on the websites of each organisation <http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division>
<http://www.seai.ie/>”

Item 1 of 1 MEGA PROPOSAL

MEGA proposes a simple text addition in the above quoted section:- The NCENR and SEAI is aware that the support measures, mainly REFIT, are not readily available to the public at large and that new measures will be required to address this deficit, as has been achieved recently in UK legislation. Once more accessible schemes become available then information provision and relevance to the public at large will become more readily achievable by SEAI in line with Art 14

MEGA SUBMISSION WITH REASONED ARGUMENTS

ITEM 1

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ITEM 1 MEGA SUBMISSION:

Sub-section 4.2.4. reads, in general, as if all is working well in Ireland. The message given generally is that there is a very good plan already in place and that the SEAI is covering it, and will continue to cover all of the public information requirements as set in Article 14.1/2/4, as quoted below

“Article 14

Information and training

1. Member States shall ensure that information on support measures is made available to all relevant actors, such as consumers, builders, installers, architects, and suppliers of heating, cooling and electricity equipment and systems and of vehicles compatible with the use of energy from renewable sources.

2. Member States shall ensure that information on the net benefits, cost and energy efficiency of equipment and systems for the use of heating, cooling and electricity from renewable energy sources is made available either by the supplier of the equipment or system or by the national competent authorities.

4. Member States shall make available to the public information on certification schemes or equivalent qualification schemes as referred to in paragraph 3. Member States may also make available the list of installers who are qualified or certified in accordance with the provisions referred to in paragraph 3.”MEGA submits that the existing RE policies and support measures are so confused and dysfunctional that it is impossible for the SEAI to implement the information requirements of the Directive.”

The Irish NREAP sets out the REFIT scheme as the support mechanism for renewables. The principle component of a successful REFIT Application is the Power Purchasing Agreement. So a simple test of Ireland's compliance with Art. 14 is to google "power purchasing agreements Ireland" – the results useless. Next go to the DCENR and SEAI websites on renewables - plug in "power purchasing agreements" (PPA)– nothing. Browse these sites after a lot of reading PPA is briefly described in the REFIT competition doc. Also in SEAI it says for micro hydro that PPA's are available from DCENR. For micro wind it says nothing and solar is locked out of the system. Basically the principal information is only available to people "in the circle" or who work hard at getting it. The CER says PPA's are not obligatory and not available to all. So basically the SEAI hasn't a hope of complying because the entire system is clouded with mystery and insider advantage. Most of microgeneration is automatically excluded but the DCENR and SEAI websites claim that the best is being done for renewables in Ireland.

MEGA submits that REFIT is not working and that Ireland is in total non-compliance with the directive and the NREAP document in its current draft form is saying that no changes are to be expected. In the information provision and other measures in the NREAP draft document as it now stands it is certain that a crisis in the energy sector, as big as that endured in banking, is inevitable.

Item 1 of 1 MEGA PROPOSAL

MEGA proposes a simple text addition in the above quoted section:- The NCENR and SEAI is aware that the support measures, mainly REFIT, are not readily available to the public at large and that new measures will be required to address this deficit, as has been achieved recently in UK legislation. Once more accessible schemes become available then information provision and relevance to the public at large will become more readily achievable by SEAI in line with Art 14

Consultation by the Department of Communications, Energy & Natural Resources on sub-section 4.2.4 of the NREAP template

Summary:

Section: 4.2.4 (Information Provisions)

Date of circulation: 26/3/2010

Deadline for feedback: 26/4/2010

Email feedback to: nreap@dcenr.gov.ie

REDG Reps to consult those who they represent on the REDG

4.2.4 Information provisions (Articles 14(1), 14(2) and 14(4) of Directive 2009/28/EC)

Current and future information and awareness raising campaigns and programmes, as well as planned revisions, and expected results have to be described. Member States should also indicate which responsible authority will monitor and review the effects of the programmes. When regional / local authorities have a substantial role, please also indicate and summarise it.

(a) Reference to existing national and or regional legislation (if any) concerning information requirements according to Article 14 of Directive 2009/28/EC:

The Sustainable Energy Act, 2002 (<http://www.irishstatutebook.ie/2002/en/act/pub/0002/index.html>) established the Sustainable Energy Authority of Ireland (SEAI)^[1] and detailed its responsibilities.

Section 6 (f) of the legislation sets out that one of SEAI's specific functions is to provide advice, information and guidance to both ministers and to energy suppliers and users.

6. – (1) The functions of the Authority shall be:

- (a) to promote and assist environmentally and economically sustainable production, supply and use of energy,
- (b) to promote and assist energy efficiency and renewable sources of energy,
- (c) to promote and assist the reduction of greenhouse gas emissions and transboundary air pollutants associated with the production, supply and use of energy,
- (d) to promote and assist the minimising of the impact on the environment of the production, supply and use of energy
- (e) to promote and assist research, development and demonstration of technologies connected with the foregoing paragraphs of this subsection,
- (f) to provide advice, information and guidance
 - (i) to the Minister and such other Ministers or bodies as the Minister may direct, and
 - (ii) to energy suppliers and users relating to the matters specified in the foregoing paragraphs of this subsection

(b) Responsible body/(ies) for dissemination of information at national / regional / local levels:

A section of SEAI, the **Renewable Energy Information Office** (REIO), deals exclusively with providing users and suppliers with up to date accurate technical and process information.

The Renewable Energy Information Office undertakes a range of activities for example conferences, workshops, demonstration events and study tours. All information is published online[2] with a wide range of detailed information available for all stakeholders.

In addition, the Renewable Energy Information Office (REIO) operates a telephone help desk that caters to individual queries from members of the public.

While SEAI has a specific function in this area, there are many bodies and organisations involved in the provision of information and advice on renewable energy to stakeholders, depending on the nature of the query.

These include the Department of Communications, Energy and Natural Resources[3], the Department of Environment, Heritage and Local Government[4], Eirgrid[5], ESB Networks[6] and the Commission for Energy Regulation.[7] The Association of Irish Energy Agencies (see below) also provides information on a local and regional level.

(Note: the AIEA, regional authorities, county and city managers, some of the bodies listed above or other bodies who have a role may wish to provide more input to this question as part of the consultation.)

(c) Summary of the existing and planned measures at regional / local levels (where relevant):

The Association of Irish Energy Agencies (AIEA)[8] is an umbrella organisation for local energy agencies on the Island of Ireland. The collective goal of the Agencies is to support the development and implementation of energy policy and best practice in an impartial and effective manner at local, national and EU level, through its own actions and by strengthening the capabilities of its members. It is comprised of the following local/regional bodies:

- Carlow/Kilkenny Energy Agency
- Cavan Monaghan Rural Development
- CODEMA (City of Dublin Energy Management Agency)
- Cork City Energy Agency
- Cork County Energy Agency
- Donegal County Council
- Galway Energy Agency Limited
- Kerry Energy Agency
- Kildare County Council
- Limerick Clare Energy Agency
- Mayo Energy Agency
- Midlands Energy Agency
- Meath Energy Agency
- Monaghan County Council
- Northern Ireland Energy Agency
- Tipperary Energy Agency
- Waterford Energy Bureau

•Wexford Energy Agency Management Ltd

Each of these organisations are involved to varying degrees in the dissemination of information on renewable energy as well as engaging in studies relating to renewable energy in a local context.

(Note AIEA, regional authorities, county and city managers etc may wish to provide more input to this question as part of the consultation)

(d) Please indicate how information is made available on supporting measures for using renewable energy sources in electricity, heating and cooling and in transport to all relevant actors (consumers, builders, installers, architects, suppliers of relevant equipment and vehicles)

SEAI is actively involved in providing information and advice on supporting measures for renewable energy sources to all relevant stakeholders through organising and participating in a wide range of seminars, conferences and energy shows and also in publishing information including case studies of exemplar projects.

Individual advice and guidance is also provided to key stakeholders at their request. Support schemes are widely advertised and published through targeted actions such as media advertising, energy shows and targeted stakeholder forums. Promotional efforts are generally tailored to the targeted groups in question.

There are a variety of support schemes in place to support renewable energy.

The Department of Communications, Energy & Natural Resources administers the feed in tariff scheme for the electricity sector (Refit) as well as the Biofuels Mineral Oil tax relief scheme (available until end 2010.)

The Sustainable Energy Authority of Ireland administers domestic, commercial, industrial and public schemes for renewable heat and energy efficiency as well as the field trials for micro generation.

Information on the schemes is made available on the websites of each organisation <http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division>
<http://www.seai.ie/>

Both the Government Department and SEAI attend and speak at a wide variety of conferences, workshops, seminars and events on an ongoing basis at which renewable support schemes are discussed.

Who is responsible for the adequacy and the publishing of this information?

The Sustainable Energy Authority of Ireland (SEAI) and the Department of Communications, Energy and Natural Resources (DCENR) are responsible for publishing information on supporting measures for using renewable energy sources and ensuring the adequacy of the information available. The Department of Environment, Heritage and Local Government[9], Eirgrid[10], ESB Networks[11] and

the Commission for Energy Regulation all provide information on their websites relating to the renewable energy sector.

Are there specific information resources for the different target groups, such as end consumers, builders, property managers, property agents, installers, architects, farmers, suppliers of equipment using renewable energy sources, public administration?

The Renewable Energy Information Office (REIO) organises a range of activities for example conferences, workshops, demonstration events and study tours that provide information to all interested stakeholders – information on activities in 2009 is provided at (g) below . REIO also provides information at an individual level, through its telephone helpdesk, to those stakeholders who make direct contact. Information for both applicants and suppliers to the various support schemes administered by the Sustainable Energy Authority of Ireland is available on the SEAI website [\[12\]](#).

The Department of Communications, Energy & Natural Resources has published on its website the terms and conditions of Refit (the renewable energy feed-in tariff scheme) as well as a series of clarifications on the operation of the scheme.

<http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division/>

The Department deals with queries on the operation of the Refit scheme on an ongoing basis and meets with industry representatives on request. The Department also handles queries and provides information on the Biofuels Mineral Oil tax relief scheme on an ongoing basis.

Are there information campaigns or permanent information centres in the present, or planned in the future?

The Sustainable Energy Authority of Ireland's subsidiary, the Renewable Energy Information Office, is a permanent information centre established for the purpose of disseminating information on renewable energy. <http://www.seai.ie/Renewables/REIO/>

(e) Who is responsible for publishing information on the net benefits, costs and energy efficiency of equipment and systems using renewable energy sources for heating, cooling and electricity? (Supplier of the equipment or system, public body or someone else?)

The Renewable Energy Information Office publishes various information leaflets on individual equipment in domestic, commercial and industrial settings which includes a typical payback period for technologies. This general information is supported by case studies of real world applications of these technologies. http://www.seai.ie/Renewables/REIO_Library/

In addition, SEAI undertakes the gathering of energy related statistics through its Energy Policy Statistical Support Unit (EPSSU). This data is periodically published and also forms the basis for future projections.

http://www.seai.ie/Publications/Statistics_Publications/

(f) How is guidance for planners and architects provided to help them to properly consider the optimal combination of renewable energy sources, high efficiency technologies and district heating and cooling when planning, designing, building and renovating industrial or residential areas? Who is responsible for that?

The Renewable Energy Information Office has developed targeted resources for planners and architects e.g.

Renewable Energy in Your Home Leaflets

[Passive Homes - Guidelines For The Design And Construction Of Passive House Dwellings In Ireland](#); (PDF, 2.04MB)

[Retrofitted Passive homes - Guidelines for Upgrading existing dwellings in Ireland to the PassivHAUS Standard](#); (PDF, 2.5MB)

[Passive Solar Design](#) (.pdf, 848kb)

[Solar Water Heaters](#) (.pdf, 156kb)

[Renewable Heat Pumps](#) (.pdf, 222kb)

[Wood Pellet Stoves](#) (.pdf, 848kb)

The Renewable Energy Information Office has also hosted low energy building design days and workshops and sent study groups to international conferences. The annual 'See the Light' national conference focuses specifically on low energy buildings and the integration of renewable energy technologies.

(g) Please describe the existing and planned information, awareness raising and training programmes for citizens on the benefits and practicalities of developing and using energy from renewable sources. What is the role of regional and local actors in the designing and managing these programmes?

SEAI through the Renewable Energy Information Office provide detailed and up to date information for all stakeholders including citizens. Regional bodies under the aegis of the AIEA are involved in providing information and running information campaigns at a local level.

(Note: The AIEA, regional authorities, county and city managers etc may wish to provide input to this question as part of the consultation.)

The following is an overview of informational activities undertaken by the Sustainable Energy Authority of Ireland in 2009:

- During 2009 the Renewable Energy Information Office developed a number new resources including a web based range of energy cost benefit calculators for willow, miscanthus, hemp, anaerobic digestion, solar thermal and geo-thermal heat pumps.

See http://www.seai.ie/Renewables/REIO_Library

- The Renewable Energy Information Office introduced a series of procurement guidelines for solar, biomass and geo-thermal systems providing professionals with

- Typical project cycle & special planning considerations
- Design guidelines
- Specification guidance note
- List of references
- List of tools (software)

- With regard to printed material the Renewable Energy Information Office produced two targeted publications Re_Energise and Bioenergy News.

http://www.seai.ie/Renewables/REIO_Library/REIO_Publications/

- REIO also launched a second set of passive house guidelines for retrofitting existing properties and developed a third in this series focusing on non-residential passive house projects. Note: The Passivhaus Institut (www.passiv.de) endorsed both publications and now disseminates copies and the web link to all English speaking countries as definitive guides.

[Passive Homes - Guidelines For The Design And Construction Of Passive House Dwellings In Ireland](#); (PDF, 2.04MB)

[Retrofitted Passive homes - Guidelines for Upgrading existing dwellings in Ireland to the PassivHAUS Standard](#); (PDF, 2.5MB)

- The Renewable Energy Information Office also developed a best practice guide for solar pv.

- Each month the Renewable Energy Information Office releases an electronic newsletter E-Update to some 8,000 subscribers.

- The Renewable Energy Information Office's call centre answered over 8,000 calls in 2009.

- In support of informational activities SEAI released 11 approved media features to the specialist and trade media on topics ranging from passive houses to wood heating.

- SEAI delivered 23 presentations at local and national events plus presentations at three international events

- 30 schools participated in a series of education workshops that the Renewable Energy Information Office presented.

- The Renewable Energy Information Office operated the Sustainable Energy Pavilion at the National Ploughing Championships and invited 20 companies (providers of solar thermal and pv, wood heating, biomass, geo-

thermal, wind turbines etc.) to participate in providing a one-stop shop information service to consumers.

- In 2009, SEAI organised 3 international study tours, the first to Germany with a group of 50 architects at the 13th International Passive House conference in Frankfurt. Site visits to see six different projects were arranged. The second study tour focused on the energy opportunities for Irish landowners and farmers and was to the Agri-Technica 2009 event in Germany and again included site visits. The third study tour was in Austria, focused on energy efficient buildings
- SEAI organised four national conferences as well as several significant workshops and seminars
 - See the Light 2009 in Galway focused on low energy, passive houses and the integration of renewable energy technologies in buildings.
 - Bioenergy 2009: The June conference focused in supply, demand and wood fuel quality. Over 40 technology service and product/fuel suppliers exhibited attracting over 2,000 visitors. The demonstration event focused on wood fuel harvesting and concluded with a site visit to see an operational biomass DH system in Callen, Co Kilkenny.
 - Anaerobic Digestion (AD) in Ireland – Tomorrow's Thinking Today – was a national conference focusing on AD, target audience was landowners, farmers, agricultural advisors and developers, the food industry, independent power producers, environmental regulators, government departments, energy consultants and financial institutions.
 - Planning for New Renewables – focussed on planning and regulatory issues on wind (small, large and auto generation) and emerging technologies.
 - 4 professional seminars and demonstration events were run focusing on wood fuel quality, supply chains, energy crops and AD feed stocks as well as 3 events in support of ReHeat, CHP and CHP AD programmes
 - 2 two-day workshops, targeting the construction industry and architects and focusing very specifically on greening the built environment and the concept of the passive house.



Image (1 Case)

[1] www.seai.ie

[2] <http://www.seai.ie/Renewables/REIO>

[3] <http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division/>

[4] <http://www.environ.ie/en/>

[5] <http://www.eirgrid.com/renewables/>

[6] http://www.esb.ie/esbnetworks/generator_connections/micro_gen_connections.jsp

[7] <http://www.cer.ie/en/renewables-overview.aspx>

[8] <http://www.aiea.ie/home>

[9] <http://www.environ.ie/en/>

[10] <http://www.eirgrid.com/renewables/>

[11] http://www.esb.ie/esbnetworks/generator_connections/micro_gen_connections.jsp

[12] <http://www.seai.ie/Grants/>