



## Comharchumann Fuinnimh Oileáin Árann Teoranta

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A Chara,

Below is a response to DECCs public consultation on a Microgeneration Support Scheme from Comharchumann Fuinnimh Oileáin Árann Teo.

We are very happy that, at last, the Irish prosumers are being rewarded for their willingness to take part in the transition to clean energy and help to tackle the climate emergency. We believe that all citizens have a very important role to play in Irelands response to climate change, and that they should be encouraged to adapt in any way they can to facilitate a just transition to 100% clean energy.

While we recognise the immense efforts required to get this scheme to this stage, we were very disappointed to see such an emphasis placed on BER ratings and very restrictive caps placed on installations. Both of these affect rural residents and buildings more than those in cities and we feel that those outside of urban areas and their suburbs may have been overlooked.

We hope that you will take our position on board in the finalising of the design of this scheme and consider adapting the scheme to encourage rather than disappoint those making any small effort to being a part of the solution, rather than the problem.

Le meas,

Avril Ní Shearcaigh.

Banisteoir.

On behalf of Comharchumann Fuinnimh Oileáin Árann Teo.



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**Q1. Do you agree with the approach to introduce the CEG in order to provide an export payment that reflects the fair market value of the electricity in compliance with the recast Renewable Energy Directive? If not, what alternative model would you propose and why?**

Yes, we agree with the approach to introduce the CEG in order to provide an export payment that reflects the fair market value of the electricity in compliance with the recast Renewable Energy Directive.

**Q2. Do you agree that initially the CEG should be a fixed, minimum tariff provided by Suppliers as a pass through cost based on the annual average Day Ahead Market (DAM) wholesale electricity price? If not, what alternative model would you propose and why?**

Yes, we agree with this also. It should also be simple for regular citizens to calculate the rate at which they are to be paid for their power. Not many are familiar with the DAM. It is also fair that suppliers pay the same for the power they purchase, regardless if its source is microgeneration or not.

**Q3. A common 3.75% discount rate across all sectors assessed was chosen as an input to the viability gap assessment. Do the respondents agree with this approach? If not, what alternative would you propose and why?**

In our view, this is far too low. As we are already far behind the rest of Europe regarding paying our microgenerators, we should ensure that the incentives we offer are appealing. This pay-back period is far too long, a pay-back period of 5-7 years would be far more reasonable, although still lengthy. In order for citizens and businesses to participate any incentive offered should be meaningful, and not just another reason not to invest.

**Q4. The emerging policy includes a measure whereby all Renewables Self-Consumers who install micro-generation technology after 30th June 2021 can access a payment of a fixed, minimum Clean Export Premium tariff for exported electricity determined by the lowest cost technology for each sector. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

Yes, the CEP is positive in that it should encourage investment in solar PV by domestic consumers. Again, the pay-back period being suggested will mean that many non-profits, community buildings and businesses will be excluded from participating. This should be reduced in order to allow everyone an equal chance to participate.

**Q5. The proposed Clean Export Premium tariff for exported electricity will be offered for a maximum duration of 15 years for all technologies. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

Yes, we agree.

**Q6. The high level design includes a measure whereby a Clean Export Premium tariff for exported electricity will be capped by exported volume related to the installation size in order to prevent over-remuneration. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

No. Self-consumption is already favourable to consumers over export as the wholesale price of electricity is far less than the price charged by suppliers. The cap on installation size suggested are far too small (houses -3 kW, school/community/farm -11 kW, SME -50 kW) We suggest schools and community/farm have no limit, and that the cap on homes is increased to 6kW. We also suggest that the export caps for both homes, communities and non profits be removed altogether. These caps are much lower than elsewhere in Europe and non in keeping with the idea of a 'just transition'.

**Q7. The high level design proposed 4 eligible renewable technologies listed above. Do the respondents agree with this proposal? If not, what alternative would you propose and why?**

Registered in the Registry of Friendly Societies, Registration Number: 5593 R.

Directors: Dara Ó Maoildhia, David O'Halloran, David Terry, Eoin Morrissey, Fiona Belton, Marc O Goill, Owen Kelly, Ronan MacGiollapharaic, Terry Heery.

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Yes, we agree. But, on a wider note, we also believe that the department should always include hydrogen as another potential technology to include in the transition to clean energy.

**Q8. There is a range of renewable technology that can be deployed in domestic and SME premises and can facilitate high levels of renewable electricity selfconsumption. The definition of micro-generation is therefore proposed to be “microgeneration technologies including micro-solar PV, micro-hydro, micro-wind and micro-renewable CHP with a maximum electrical output of 50kW”. Do the respondents agree with this proposal? If not, what alternative would you propose and why?**

Yes, we agree

**Q9. Applicants will be required to have an export connection from the Distribution System Operator. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

Yes, we agree but we also suggest that the means of acquiring an export connection is revised and simplified as a matter of urgency. All homes/businesses/farms and community buildings as well as SMEs capable of exporting energy should automatically become eligible for a smart meter.

**Q10. The CEP will be available to existing buildings only. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

No, we feel that all new installations should be supported. The more clean energy being produced and used by citizens the better. Everyone considering installing renewable technologies should be encouraged.

**Q11. Occupied buildings will need to achieve a minimum post-works BER C rating. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

No, We feel it is completely unjust to connect the feed-in-tariff to a BER rating. The BER rating is mostly influenced by heat-loss. Reducing heat loss and making a home more comfortable is enticing enough, those who are in a position to do so will undertake this work but those who are not will be further disadvantaged by this restriction. Instead of using their BER as a stick to beat them with, they should be encouraged to embrace clean technologies and even use the income from their installations to help finance further upgrade works.

**Q12. The minimum BER rating for the MSS will be increased over time to align with other Government energy efficiency retrofit programmes. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

Again, the BER should not be connected to this scheme at all, it is unjust and only benefits those in strong financial situations or in urban areas.

**Q13. Community groups must conform to the definition of a Renewable Energy Community and be registered with SEAI. Do the respondents agree with this approach? If not, what alternative model would you propose and why?**

Yes, however if they are already in an area covered by an SEC they should not have to register as a separate one. For example, there are 2 SECs on the Aran Islands covering the 3 islands, the 7 schools across the islands should not have to register as 7 more SECs in order to get paid for their energy.

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**Q14. The emerging policy proposes that Suppliers recover the costs of the Premium support through the PSO. DECC welcome the respondents' views on the funding mechanism supporting micro-generation. Do you think the PSO should support microgeneration or should this be through Suppliers retail rates or other mechanism?**

Yes, although those who are fuel poor should not be overly burdened by such a change to the PSO levy.

**Q15. DECC welcomes the respondents views on how to manage the scheme costs and the frequency of changes in the support arrangements.**

- We strongly believe that all electricity exported from micro generators should be paid for and that all those willing to invest in renewables should be encouraged without discrimination.
- We on Aran have been encouraging the installation of PV as an early or first step in a household's energy transition. Many houses on Aran already have PV and had it long before their BER was a C or B. The existence of PV on their rooftop is a visible sign to their neighbours that they have bought in to the energy transition. It is therefore an encouragement to others to do the same. We want that to continue, without any imposed restrictions, and with the added incentive of payment for their electricity sold to the grid. Until now, the absence of this payment was a disincentive for people to install PV.
- Connecting PV microgeneration payments with BER ratings, apart from all our other objections to it, will add a further expense to householders, who will have to acquire a BER rating for their house at their own expense. A BER for a typical house on Aran costs in the region of €300. Larger buildings, such as b&bs will cost a lot more. This will be a further disincentive.