Energy Strategy Call for Evidence

Response Template

How to Respond

This template replicates the questions asked in the Call for Evidence found at: https://www.economy-ni.gov.uk/energy-strategy-call-for-evidence

It is recommended that you should read the full consultation document before completing your response. Please note that the text boxes used throughout this template can be expanded to accommodate your response – there is no character limit.

For further information on how we handle your personal data please read our Privacy Notice

Early responses are encouraged but all responses should arrive no later than **5pm on 20 March 2020.**

Please send your response to:

energystrategy@economy-ni.gov.uk

Or alternatively by post to:

Energy Strategy
Department for the Economy
Netherleigh
Massey Avenue
Belfast
BT4 2JP

Quote the reference "**Energy Strategy Call for Evidence 2019**"

1. General Information

1. **Name (required)**

[redacted]

2. **Are you responding:**

   ☐ **as an individual (please complete 3 to 5 below)**

   X on behalf of an organisation / company (please complete 6 to 8 below)

If you are responding as an individual:

3. **E-mail address**

4. **Address**

5. **If you are responding as an individual, please read the Privacy Notice and tick the statement below as applicable.**

   ☐ **All responses will be published on the Department for the Economy website following completion of the Call for Evidence process. Please tick if you are content for your name to be published alongside your response.**

If you are responding on behalf of an organisation / company:

6. **Organisation / Company**

Bryson Energy, part of Bryson Charitable Group

7. **Position within Company / Organisation**

[redacted]

8. **Contact details**

   a. **E-mail address**

[redacted]

   b. **Address**

[redacted]

2. Energy in Northern Ireland

Q1. What lessons can we learn from elsewhere in addressing energy within an overarching climate action framework?

Q2. What are the key considerations for decarbonising Northern Ireland's energy sector given existing linkages to other jurisdictions?

Q3. To what extent should Northern Ireland implement the key energy-related recommendations from the CCC 'Reducing Emissions in Northern Ireland' report?

Q4. Do you agree with the 30-year timeframe? If not, please state your preferred approach and reasons.

Q1
Several of the leading countries who are on track to meet their Climate Change and domestic energy targets are Sweden, Portugal and France. Many other countries are falling behind, including the UK who are no longer at the forefront of their fight against climate change. A "ranking" of countries can be found at:
http://www.caneurope.org/docman/climate-energy-targets/3357-off-target-ranking-of-eu-countries-ambition-and-progress-in-fighting-climate-change/file

Q2
Energy policy must enable an efficient, interconnected energy market to operate on both sides of the border.

Q3.
The CCC recognised the differences in NI compared to the rest of the UK where Ni has a unique set of circumstances which need addressed.

Q4.
The 30 year time scale is ambitious and challenging and if accepted must be sufficiently resourced.

3. The Energy Transition in Northern Ireland

Q5. What are the unique characteristics of Northern Ireland that need to be considered in a net zero carbon energy transition?

Q6. Is your organisation undertaking or planning to undertake projects to support the energy transition? If so, please provide further details.

Q5.

Northern Ireland has high levels of fuel poverty homes which will not have the option to invest in carbon neutral heating systems.

There is a sever lack of baseline information on the energy efficiency of homes in Northern Ireland and this needs to be addressed before we could decide wjhat action we need to take. In the first instance Bryson believe in a fabric first approach and ensure houses have energy efficient measures are installed as a priority.

We are aware that the bulk of energy demand is for heat and in a domestic setting the high reliance on oil at 68% needs addressed. Many households are not aware of alternatives. While Bryson recognise that systems such as Biomass and Heatpumps may not suit all households they are options worth educating householders in.

Bryson Energy suggest a fabric first approach followed by an "End to Oil" awareness campaign to promote biomass heating (based on the domestic RHI if reintroduced) and Heatpumps etc

Bryson Energy has long advocated for a "Whole House" solution to fuel poverty. This wrap around service ensures that disruption can be kept to a minimum and once access is gained works can be carried out at once rather than piecemeal over a number of separate interventions.

Examples such as the Austrian "End to Oil" Campaign could be implemented in Northern Ireland to help reduce the high percentage of householders on oil. See; https://www.xn--adieul-0xa.at/

Q6.
Bryson Energy has already installed 70 wood pellet boilers in fuel poor households to replace broken or old and inefficient oil systems outside of the gas network. Bryson would wish to see the Domestic Renewable Heat Incentive reintroduced and targeted at fuel poor households to replace old, inefficient oil systems where gas is not an option.

Bryson Energy operated the Warm Homes Scheme from 2009 to 2015 installing Energy Efficient measures through a network of energy installer subcontractors in fuel poor homes

Bryson are working with SIB and B9 on B9's Belfast Power to X Scheme in the areas of marketing, commissioning, customer relations, tariff structures, fuel poverty, operations amongst other areas.

4. Consumers

Q7. How should we ensure that energy remains affordable for domestic consumers? What approach should be taken to eradicate fuel poverty?

Q8. What steps could be taken to improve the relative cost competitiveness of larger non-domestic consumers?

Q9. Is a strategic position of "enable and protect" the correct policy stance?

a) What policies or schemes are needed to enable active consumers?
b) What policies or schemes are needed to protect vulnerable consumers?

Q10. What types of advice and information are required by all consumers and what are the best mechanisms for facilitating this?

Q11. Are there examples of successful citizen energy projects in Northern Ireland and elsewhere that have delivered improved energy efficiency and/or clean energy to local communities?

Q12. What opportunities are there in both urban and rural areas for citizen energy communities in Northern Ireland? What role could government have in facilitating these?

Q13. What evidence can you provide that identifies the challenges and opportunities for NI energy consumers in decarbonising energy?

Q7.

In order to ensure energy remains affordable for domestic consumers there are a range of measures that could be undertaken:

Social and time of day tariffs, Regulation of oil – price and safety, Behavioural advice, Switching guidance etc however we need to know the costs of energy transition. The advance of capital investment ensures warm, comfortable homes and improves health outcomes and lower fuel bills.

A tiered system of energy use might protect those who can least afford it and be subsidised by those using excessive energy paying a higher price.

Those consumers who do not own their own homes and are in the rented sector need to be protected. A system in which private-rented properties cannot be released to a tenant before a minimum SAP has been achieved could provide a means by which a tenant moving out of a property triggered retrofit.

Q9

The strategic position of “enable and protect” are the correct policy stance for both active and vulnerable consumers.

Q10.

Impartial and independent energy advice and information is required through a onestop shop for all domestic consumers. This should be resourced by Government but operated by a social enterprise type organisation who has no vested interest in the measures installed. This organisation would work in partnership with a wide range of interested parties such as Consumer Council, NEA, Age NI etc. Who could form a steering group to ensure oversight and a single simple message for the consumer.

Current grant structures need to be brought together into a single, well resourced programme with a simple, single energy message (e.g. Energywise?) where behavioural change and highlighting the need to change can be coordinated in a single, clear message. Installers should not operate the programme but rather a not for profit / social enterprise who has no vested interest in the actual installation. It would of course subcontract the work to a large number of registered installers to carry out the measures. This example worked well on Warm Homes which proved itself to be an extremely efficient and cost effective scheme.

Q11.

Community Energy Projects are a way forward for local communities to generate or save energy with local initiatives. An example in Northern Ireland that Bryson Energy was closely involved with is Drumlin Wind Energy Co-operative with four sites in Northern Ireland. This highlights the potential within our communities to generate renewable energy with collective local ownership and shared local benefits. Potential exists for local communities in energy efficiency, retrofit and awareness-raising .Enthusiasm from communities across the country to engage with energy policy and energy generation is currently strong however “Mentors” are needed to help build capacity which could be supported by Government.

Under the previous DECC funded Sustainable Energy Centres, Bryson Energy operated the NI pilot which proved successful in both its partnerships and carbon savings. Government could support regionally based Carbon reduction Officers to assist both communities and individual houses with behavioural and energy measure options. These centres highlighted opportunities for NI consumers decarbonising energy in a domestic setting.

5. Energy Efficiency

Q14. What, if any, energy efficiency target or targets should be set for Northern Ireland?

Q15. How should we define, measure and monitor energy efficiency to optimise its potential in our homes, business, economy and environment?

Q16. What are the most important policy levers for government to ensure zero carbon in:

a) New domestic and commercial buildings by 2050?;

b) Existing domestic and commercial buildings by 2050?

Q17. What should the future of energy efficiency support look like and who should be the key delivery bodies?

Q. 14

An Energy target could be based on the energy rating of the home. Setting a minimum baseline SAP to be achieved through retrofit could be undertaken In the following:

Transforming Northern Ireland's Heating Systems: A Plan to Retrofit Dwelling Intro (Liddell) - August 2014. (See www.brysonenergy.org – publications)

There was considerable detail on what that level could be.. A target could be based around a SAP of 78, would balance impacts against costs.

Q. 17

Energy Support should involve all sectors but delivered through a "One Stop Shop" (see above at Q10.)

Support could include and be based around the following:

Affordability
Principle polluter pays
Better use of winter fuel payment
Protect for consumers - Bryson are keen to ensure that the financial burden of decarbonisation does not fall on those who can least afford it - the fuel poor households.
We need to look at levys on utilities, oil regulation, targets needed and an action plan
Energy Efficiency
A fully resourced One Stop Shop for households - independent and impartial advice needed
The lowest carbon unit of energy is the one you don't use so Bryson wish to see an emphasis on behavioral change - information, advice and education needed.
Energy efficiency has positive benefits for health, physical and mental wellbeing. It can reduce hospital visits reduces days off school and academic attainment is obviously better if you hau have a warm and separate place to study.
We need a baseline of where we are now
We need to set standards of Energy Efficiency Measures
Action
We would like to see an end to oil campaign particularly relevant here due to 68% of households using oil
Potential for domestic pellet boilers in homes to get off oil along with heat pumps and gas concentration
Increased budget for Energy efficiency in NI is not enough for the task in hand - we are tinkering around the edges
Climate Emergency
Committee for Climate Change says we need to spend 500m - £1B or next 20 years - Funding will need to be across Departments as EE impacts on their remits
Tariffs

We would like to see time of use (benefits of renewables), tiered tariffs and social tariffs
Smart Meters
Households must benefit from Smart Meters - they cannot be solely for benefit of suppliers
New Technologies
Need to be simple for use by consumers
There needs to education of consumers in technology - Consumer lead - EnergyWise - Consumer at centre.
Homes will become both producers and consumers of energy under decentralisation
Timing
Short term - install gas, insulate etc
Long term - Deep retrofit
Build Regulations
Need to be reviewed, higher and ambitious
Future
What is the impact of our actions on future generations

There needs to be consideration for social enterprise suppliers where social purpose not profit is the motivator. This could be in the areas for example of electricity supply and administration of grant schemes.

Advice for consumers needs to be impartial and operated on a One Stop Shop basis. This can be provided by the social enterprise sector who do not have a solely profit motivation. Alongside information specific advice should be offered and consideration given to home visits to complete energy surveys highlighting areas for the installation of measures along with costs, timescale and options.

6. Heat

Q18. What is the appropriate pathway and timeline for the decarbonisation of heat between now and 2030, and subsequently to 2050?

Q19. What are the appropriate ways to measure the progress of decarbonising heat?

Q20. What are the most cost-effective and sustainable steps that government might take to accelerate the reduction of the carbon intensity of heating fuels?

Q21. Is decarbonisation of the gas grid a viable option and what evidence can be provided on both the speed and affordability of decarbonising the gas grid?

Q22. What evidence can you provide on the opportunities for district heating schemes in Northern Ireland and where should responsibility lie for facilitating these?

Q23. Can you provide any evidence or information on the opportunities for geothermal heat supply?

7. Power

Q24. What is the appropriate pathway for the decarbonisation of power from now to 2030, and subsequently to 2050?

Q25. What target for electricity consumption generated from renewable sources by 2030 is ambitious, achievable and affordable?

Q26. How can the new infrastructure necessary to meet a new renewable electricity target be delivered in a timely, affordable and acceptable way for consumers and society?

Q27. What innovations and solutions could contribute to meeting a new renewable electricity target?

Q28. What market incentives and support are necessary for investors to deliver the investment in renewable generation assets at a scale that will achieve a new renewable electricity target?

Q29. What steps need to be taken by Government to facilitate investment in offshore and marine renewables for NI?

8. Transport

Q30. What would be an appropriate pathway to decarbonised energy for transport to 2050?

Q31. What role should active travel have in the decarbonisation of the transport sector and what should government do to support this?

Q32. What energy infrastructure is needed to facilitate the uptake of electric vehicles in line with UK Government's 'Road to Zero' targets?

Q33. How will transport integrate with other energy uses (e.g. homes with solar generation, battery storage, EV charging) and what can government do to optimise the opportunities represented by this integration?

Q34. To what extent can alternative low carbon transport fuels contribute to decarbonisation of the transport sector?

Q35. Do you have any data/research to help inform and reduce the carbon intensity of our transport energy in order to achieve net zero carbon by 2050?

9. Other Issues:

a. Security of Supply

Q36. What specific risks to security of energy supply are likely to emerge as a result of our changing energy mix, and what actions can be taken to mitigate these?

Q37. What measures or indicators could be adopted or developed to monitor energy security of supply?

b. The Role of Data

Q38. What is the most cost-effective method of capturing consumer energy usage data in electricity and natural gas (where meters are in place)? In heating oil (where there is no metering obligation)?

Q39. What concerns need to be addressed regarding data privacy, security and/or ownership?

Q40. What are your views on applying the key recommendations of the Energy Data Taskforce for NI?

Q41. What organisations or businesses do you see as having a key role in optimising the value of data? How will they do this?

c. Carbon Capture and Storage

Q42. What steps, if any, should NI policy-makers consider with regard to the development or implementation of CCUS in NI?

d. Energy and the Economy

Q43. What specific economic opportunities will arise from the decarbonisation of energy?

Q44. What skills are needed to realise the potential economic benefits of energy in the future?

Q45. What are your views on the future of overall energy demand in NI and how can we ensure that any potential demand growth aligns with our net zero carbon target?

e. Delivery Framework for an Energy Strategy

Q46. Do the existing division of responsibilities and powers across government enable the most effective approach to the overall aim of decarbonising energy? If not, what are your suggestions for improvement?

Q47. What are the opportunities for local government to contribute to the delivery of the net zero carbon target?

Q48. What are your views on how statutory duties and accompanying legislation and regulatory frameworks would need to change to facilitate the transition to net zero carbon by 2050?

Q49. Is there a need for a dedicated organisation to champion, lead and deliver sustainable energy interventions? If so, what should this look like?

10. Additional information

Q50. Is there anything else you would like to add in response to this Call for Evidence?