
2030 M&R Methodology and Targets Consultation

Submission prepared by Codema - Dublin's Energy Agency

January 2020

Background

Codema is Dublin's Energy Agency and was founded in 1997 as a not-for-profit limited company. We are the energy adviser to the Local Authorities in Dublin; our role is defined around the core function of supporting the local authorities in their own sustainable energy use. A second role is engaging with EU and nationally funded energy programmes to bring innovation to the Dublin region. A third and increasingly important role is to increase energy awareness among the citizens and energy stakeholders in Dublin. Over the years, these three strands have become increasingly intertwined and integrated into a comprehensive local and regional service for energy and climate change. Examples of Codema's work include district heating system analysis, energy performance contracting, management of European projects, energy saving behavioural campaigns, detailed energy reviews and energy master planning. Codema is well networked in Europe and has been very successful in bringing European projects to Dublin with a local implementation for the Local Authorities.

Context

Codema welcomes the opportunity to make a submission to this consultation process. Codema recognises the value of the M&R system that has been developed and that it is a pioneering system in an international context. Codema reports to SEAI through the M&R process for the 4 Dublin Local Authorities (DLA's). Since the implementation of the M&R process Codema has utilised the outputs from the system to aid the Dublin Local authorities in developing detailed energy reviews of the council's energy use in buildings and fleet. These energy reviews clearly demonstrate where energy is used within the councils, what drives its consumption, and where the greatest energy saving potential is. The reviews also identify where the councils are currently in relation to public sector energy targets, and what areas need to be addressed in order to meet these targets between now and 2020. These reviews and the progress made within the Dublin LA's would have not been possible if it was not for the quality of the data which the M&R provides.

Response to Consultation

Codema's response to this consultation will concentrate on our areas of expertise in relation to the use of the M&R System, including a response to every question detailed in the consultation paper.

Consultation Questions

Question 1: Which of the three options being considered for defining the 30% by 2030 CO₂ reduction targets is your preferred approach? Why?

The preferred option for defining the 30% by 2030 CO₂ reduction target is Option 3: 30% of Direct CO₂ and 30% of Electricity as it is the most ambitious and ensures that all organisations need to take action and not rely on the decarbonisation of the electricity grid to reach targets. It is also the view of Codema and the DLA's that this **target is not ambitious enough**. Currently the DLA's are signed up for the EU Covenant of Mayors for Climate & Energy. The Covenant of Mayors brings together thousands of local governments voluntarily committed to implementing EU climate and energy

objectives. The DLA's have committed to achieve 40% carbon reduction by 2030 which goes beyond the 30% by 2030 CO₂ reduction targets of Option 3 and the requirement of EU Energy Efficiency Directive (EED) 2012/27 - DIRECTIVE 2012/27/EU.

It is recommended that an option be included within the methodology to allow organisations to set their own targets and that the 30% by 2030 CO₂ reduction target of Option 3 be the minimum requirement within the methodology. This will allow individual organisations to align the targets to their own policy frameworks.

Question 2: Which baseline period should be used for tracking progress towards the 30% by 2030 CO₂ reduction target? Why?

All of the DLA's have already committed to 40% GHG reductions under the Covenant of Mayors agreement, using 2006 or 2009 as baselines. Many are already close to 30% by the end of 2018. If Option 1 is selected, then a later baseline such as 2019 should be used to **encourage more significant action to be taken**. If Option 3 is to be used, then an earlier baseline such as 2009 may be suitable.

Question 3: Should formal interim target(s) be set for year(s) between 2020 and 2030? If yes, for which year(s) should targets be introduced and should interim targets be front-loaded or on a constant-glidepath?

The use of the glidepath system during the 2020 reporting process is an invaluable tool to show yearly progress to senior management. This process should be continued with also the integration of interim targets. Ideally, they would be front-loaded in order to **encourage early action and maximise cumulative savings**.

It is agreed that DCC and other LA's have taken advantage of the decarbonisation of the electricity grid to reach targets. This has given the public sector a false sense of accomplishment as easy savings have been made over the past decade. It also has to be said that change in the local authorities can be slow. Taking both these points into account early action is essential to ensure senior management put in place the resources and mechanisms the 2030 targets will need to guarantee targets are met by 2030 and beyond. If early action is not taken savings later on in the decade will be harder to achieve.

If this is not possible, then a constant-glidepath should be used as in the 2020 reporting process. Back-loading should not be considered and will only encourage delay in taking action and will only result in harder targets to achieve coming to the end of the decade.

Question 4: Do you consider that the concept of freezing pre-2020 data is a good one, even though you would have to put time and effort into engaging with SEAI to undertake a pre-freeze data verification exercise?

Yes freezing data pre-2020 is the logical approach. The DLA's have always cooperated with SEAI while undertaking detailed verification assessments and feel that they are an essential process to guarantee that the data within the system is robust. Codema and the DLA's will fully support a detailed data verification assessment if the freezing of data pre-2020 approach is chosen.

It is agreed that organisations should not be able to change their pre-2020 data once it has been verified and this can only be in exceptional circumstances and require a DVA.

Question 5: Should an organisation be allowed to track its performance using different activity metrics for different periods? What limits should be put on this flexibility?

Organisations should not be able to freely change their activity metrics without specific approval from SEAI. This should only be in exceptional cases, where the drivers of energy consumption have significantly changed. This will ensure that public bodies can't use metrics as a means to artificially help them meet targets without taking action.

Question 6: Do you have any specific proposals for how CHP, landfill gas or onsite renewable electricity generation should be counted when tracking progress towards the 50% by 2030 energy efficiency target?

If any element is to be included to reward CHPs, it should only be available to plants which have achieved High Efficiency CHP certification. Landfill gas projects should be rewarded somehow if the reduction in methane emissions isn't recorded in the CO₂ tracking. If CO₂ equivalent were to be tracked then this could reward LFG projects.

Question 7: How should the methodology for tracking progress towards the 30% by 2030 CO₂ target align with other existing methodologies? Please be as specific as possible with your response and bear in mind that the M&R is not a blank slate: any approach for tracking progress towards the 30% by 2030 CO₂ target must be well-aligned with existing M&R methodologies.

CO₂ equivalent should be recorded so that methane emissions are included, such as from landfill gas. Organisations such as Coillte and Bord na Móna should have to account for the full carbon impact of their operations, including the loss of carbon sequestration.

Question 8: Apart from tracking progress towards the 50% by 2030 and 30% by 2030 targets, what reporting obligations on public bodies should SEAI consider integrating into the M&R system?

Codema currently generate all of the DEC's for the DLA's. Codema and the DLA's welcome the possibility of the integration of the generation of the DEC's through the M&R process. This would possibly encourage other LA's to generate DEC's for LA facilities around the country. The DEC's are an essential tool in generating awareness to LA staff and management on the current operational rating of their facilities and also enables them to set individual targets for facilities to achieve.

For research purposes, and to enable the comparison of similar building types across Ireland, the collection of floor area data, average occupancy rates per building, the building BER (if any) and connecting MPRN and GPRN data to a building and its use, would greatly assist researchers in building a picture of energy use in the public sector and finding solutions.

General Comments

Currently two DLA's, Fingal County Council and Dun Laoghaire-Rathdown County Council, have achieved certification of ISO 50001. Dublin City Council and South Dublin County Council are currently on target to achieve certification in 2020. It would be beneficial if there was a possibility to set up groups within the M&R system that align with the current identified significant energy users (SEU's) under their current energy management processes.

It would also be more beneficial if there was more transparency on the background calculations within the M&R system. This would allow the DLA's to align their current Energy Review processes more

efficiently with the M&R system. This would ensure both systems are telling the same story. All conversion factors, calculations and assumptions should be shared through the 'Download Detailed Energy Data' field within the system.

It would also be beneficial to allow LA's to set a glidepath to 2050 to show local authorities what will be the yearly targets if they are to reach the carbon neutral goal by 2050.