

# Cylon Controls response to the Energy Green Paper

- November 2006

Cylon Controls welcomes this green paper and would like to respond to some of the questions raised in section 3.2.

## *PROMOTING THE SUSTAINABILITY OF ENERGY SUPPLY*

- 3.2.11 What significant new initiatives could be taken to increase energy efficiency across the economy and in particular in households, businesses, the public sector, the transport sector and the built environment?*
- 3.2.12 What additional policy measures should be introduced to significantly expand energy RTDI and what are the priority areas of research, which need to be targeted?*
- 3.2.15 Do we need to choose between mandatory targets and better incentives for renewable energy and energy efficiency - or is a mix of both the best way forward?*
- 3.2.16 Does the Green Paper generally set the right policy directions for energy sustainability?*

One of the key policy targets outlined in the green paper is "to deliver 20% improvement in energy efficiency by 2020." This is in line with the European Performance in Buildings Directive which has targeted building energy improvements. 40% of CO<sub>2</sub> emissions derive from energy use in buildings and to achieve the policy targets set out in this green paper, significant energy reduction in buildings is required.

However the existing building regulations have missed some real opportunities to improve energy efficiency. The focus on building fabric and basic plant has failed to encourage technology solutions that reduce energy consumption. As pointed out in this green paper "technological advances are key enablers of energy policy". Demand side management is identified in the green paper but there are some concrete actions that can be taken today to support existing demand side management technology, namely Building Energy Management Systems (BEMS).

BEMS have become common in large or complicated buildings but their adoption needs to be accelerated up to reach the policy targets. Some specific actions are recommended

1. Part L of the building regulations should specify that a BEMS is required for buildings over 1000 m<sup>2</sup>.

2. Capital grants should be available to retrofit an approved BEMS system at an appropriate value per m<sup>2</sup>.
3. Capital grants should be available to businesses to encourage them to have their energy managed by a bureau service similar to the SEI funding for public sector bureaus.
4. Part L of the building regulations should specify remote metering for buildings over 1000 m<sup>2</sup>.
5. All meter data captured by utility companies should be available to end user businesses in an open (XML) format at no/nominal charge from the Meter Registration System Operator (MRSO). This would encourage commercial energy bureau operations that are prevalent in other countries. In addition ESB main meters should always include a pulse output for third party energy services providers as is the case with gas meters.

To create an effective energy saving momentum in Ireland there is a need for a carrot and stick approach. We would recommend that a carbon tax is introduced, phased in over a 6 year period to avoid any sharp energy price increases. The revenue from this carbon tax should be ring fenced to fund energy saving measures such as those we have recommended and in other areas such as those recommended in the Green Paper.