

Alison Farr
Social & Environmental Branch
NIAUR
Queens House
Queen Street
Belfast
BT1 6ER

20/03/09

Dear Madam,

The Sustainable Energy Association wish to make a submission in response to the consultation on the "Utility Regulator's Social Action Plan 2009-2014".

The Sustainable Energy Association (SEA) is an industry association which has been set-up by industry members to represent the small-scale, distributed renewable energy sector across the island of Ireland. Essentially the organisation has formed to give a voice to a growing and vital industry, and to provide a channel of communication between the Government and the SEA's member bodies.

There is a strong link between eradicating fuel poverty and the installation of heating systems that use renewable energy. Rising and unstable gas and electricity prices are replaced with energy coming from an infinite, natural source, with little or indeed no reliance on these volatile markets. In addition, renewable energy brings environmental benefits, stimulates innovation and is an increasing political winner.

In order to maximise these benefits, it is important that guidance on appropriate behavioural changes is understood alongside technical information. For example, solar thermal systems give most benefit to a family with high hot water consumption where the hot water is used throughout the day i.e. when solar gains are at their peak.

The case for renewable technology to assist in the reduction in fuel poverty is more critical in off-gas areas where the heating and hot water costs can be over double those in areas that have a connection to the mains gas.

Fuel price rises over the last three years of 100% for gas and 60% for electricity, have raised public awareness of the social and economic problems associated with expensive fuel. These price rises will have a particularly significant impact on those in, or at risk of, fuel poverty. As natural resources decline, these prices are set to rise.

In addition, security issues around the supply of natural resources continues to create heightened international tension. Renewable energy systems will overcome these challenges by generating energy independent of gas and electricity price instabilities. In addition to reducing monetary costs to householders, increased use of domestic renewable technologies will also significantly reduce costs to the environment. This is because they produce less greenhouse gasses, mainly CO₂, and will therefore improve our carbon footprint and help curtail the effects of global



warming. Government has acknowledged these environmental impacts as being national economic imperatives as well.

It is clear that micro generation technology can help in eradicating fuel poverty and reducing the carbon footprint of this energy intensive sector. However, to ensure this investment produces its maximum impact i.e. reduction in consumption of finite fuel, it is imperative that the technology is appropriate to energy demand, structural and client capacity.

The following is taken from the **All-Ireland Policy Paper on Fuel Poverty and Health** published by The Institute of Public Health in Ireland.

"The thermal efficiency of the Irish dwelling stock is among the lowest in Europe and Ireland is having extreme difficulty in meeting its target for stabilization of greenhouse gas emissions.² The household sector accounts for 26% of total final energy consumption and 29% of carbon dioxide emissions. Carbon dioxide is the main greenhouse gas implicated in global warming.¹ Low-income householders are likely to be proportionately the most penalised by carbon tax as they tend to use the most carbon intensive fuels and inefficient heating systems, in particular a dependency on electricity-based heating."

The Utility Regulator has taken an important step in tackling fuel poverty be compiling this study and hopefully the Sustainable Energy Association has been able to show that micro-generation provides a potential solution to those suffering from fuel poverty.

Should you wish to discuss these issues further, please do not hesitate to contact us.

Regards
John Hardy
Secretary

