

Eco Advocacy

Supporting Environmental Justice & Awareness

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Exploration and Mining Division,
The Commission for Energy Regulation,
The Exchange,
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29th June 2017

Attention: Grainne Black

Your Ref: CER/17/115

Public Service Obligation

Closing Date: 30th June 2017

Dear Ms Black

Further to the above public consultation, we make the following submissions: -

1. It would appear that the scheme is by and large an extension of that already operated.

ENERGIES SUPPORTED

2. **PEAT:** As a fossil fuel, it is submitted that it is inappropriate that peat powered generation stations should in any way be eligible to claim support from the REFIT schemes. Furthermore, bogs serve as a valuable carbon sink and also add value in terms of biodiversity.
3. **WIND:** Our research into wind energy demonstrates that this is not a viable renewable energy. It is hugely resource hungry; the giant turbines currently being proposed require inordinate quantities of finite sand and gravel (constituents of concrete); each of these large turbines requires upwards of some 200-lorry loads of concrete to anchor each turbine. Furthermore, they require significant quantities of steel; they require large quantities of rare earth metals (magnetic components). There are also issues regarding infrasound together with other nuisance issues.

To compound matters the energy they produce is unreliable and has to be backed up by other sources of energy.

All this and much more information can easily be ascertained by full and proper research.

4. **DEEP GEOTHERMAL:** We note the absence of Deep-Geothermal energy from the documentation provided. Having conducted extensive research, we consider this to be among the most promising sustainable forms of energy. Moreover, it is non-obtrusive visually and constant. Notwithstanding, if and when it does take off, it is essential that it can stand on its own feet commercially.

MORAL and SOCIAL ISSUES

5. It is unfair to expect citizens and businesses alike to financially support speculative ventures of private developers who have only profits as their principle objective.
We pose the question: Is it fair or reasonable that cash strapped businesses or homesteads should be paying such a levy to commercial developers?

This levy essentially increases the cost of running business and is unacceptable.

6. It is unreasonable to expect citizens to put money into the pockets of speculative business ventures. In its current form, we consider the levy as essentially transferring wealth from the poorer sections of society to the wealthier sections of society.
7. Indeed Warren Buffett, [The Wall Street Journal, May 4, 2014](#) stated that he was only pursuing wind energy for financial reasons and not out of any ideological rational.

'I will do anything that is basically covered by the law to reduce Berkshire's tax rate. For example, on wind energy, we get a tax credit if we build a lot of wind farms. That's the only reason to build them. They don't make sense without the tax credit.'

8. This levy also artificially skews the market in supporting specific business ventures, which would not otherwise be sustainable and encourages a scramble for cash. In the past, we have seen numerous ventures being disposed of, as soon a project was complete or nearing completion.

In conclusion, there are numerous other ways of incentivising renewable energy. To take money from a poorer section of society and hand it to another section of society is morally repugnant. We strongly OBJECT to the renewal or increase of this levy in its current form and RECOMMEND its abolition.

Yours faithfully,



Kieran Cummins, Solicitor & Secretary,
Eco Advocacy