

For the Attention of Ms Black,

SUBMISSION ON THE PUBLIC SERVICE OBLIGATION LEVY 2017/18

PROPOSED DECISION PAPER CER/17/115.

Submission

The proposed PSO Levy increase should be refused for the following reasons:

1. The PSO Levy was introduced in 1999 as a temporary measure. However not alone has it not been temporary it has now escalated to an outrageous levy on all households and businesses in Ireland.
2. A considerable portion of this levy is given towards renewable energy, in particular wind. In spite of the current number of industrial wind turbines installed to date in this country wind energy has not reduced CO2 levels in any meaningful way.
3. Peat power also receives a portion of this levy. Alternatives to peat power should be considered such as Combined Heat and Power which can deliver substantial energy efficiency returns in terms of utilising thermal conversion losses of power generation.
4. The State Aid REFIT Scheme was based on the 2008 State Aid Guidelines. This REFIT has now had its deadline extended on two occasions without any reference to State Aid Clearance. State Aid guidelines 2014 require competitive bidding. As no competition seemed to exist it would suggest that lobby groups influenced the extension of this scheme.
5. There appears to be a gross lack of transparency in the true level of emissions in certain power plants. Likewise there is no transparency with regard to the efficiency of power production according to each particular fuel source. This obfuscates the real contribution or true emissions both emitted, saved or negated with regard to fossil or renewable energy sources. This is unacceptable having regard to the CER's Functions under Section 5. (a) of the 1999 Act, under our obligations under the Energy and Climate package and associated Directives to reduce emissions (in particular CO2), increase energy efficiency and improve resource efficiency.
6. The proposed increase to the PSO Levy will increase fuel poverty, add stress to already burdened households and businesses in particular SMEs.

We strongly urge that this proposal be reconsidered and rejected.

Yours sincerely,

Sheila O'Brien & Elizabeth Collins

On behalf of: **Kildare Environmental Awareness Group (K.E.A.G.)**