

C/O Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown, Naas,
Co. Kildare.

District Heating Consultation,
Energy Division,
Department of Communications, Climate Action and Environment,
29-31 Adelaide Road,
Dublin 2
D02 X285

28 February 2020

Re: Public Consultation to Inform a Policy Framework for the Development of District Heating in Ireland

Dear Minister Bruton,

I am writing to you as chairperson of Renewable Energy Ireland, an open partnership of sustainable energy associations working collectively to support the energy transition in Ireland.

Our members (ranging from small farmer-led projects through Irish developer-led and multinational companies) are supporting the development of a wide range of renewable energy technologies including wind, solar, bioenergy, marine, district heating and demand response.

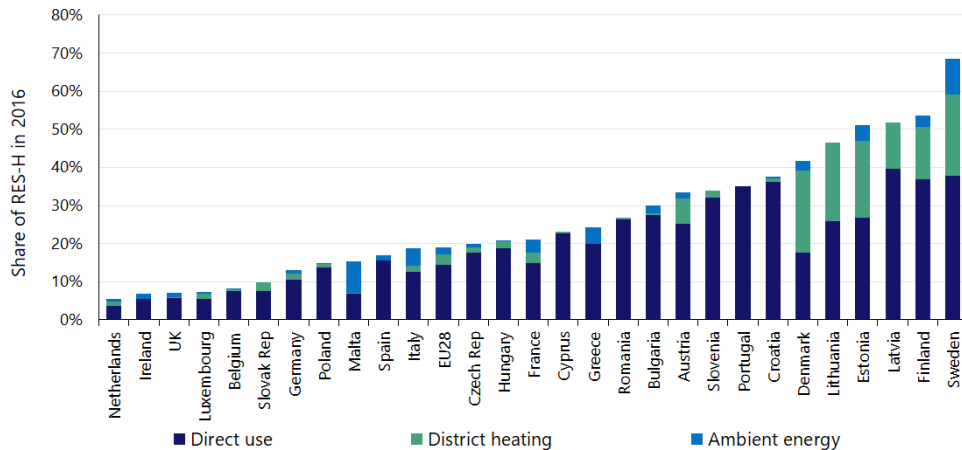
I would like to make a submission on behalf of Renewable Energy Ireland to the public consultation to Inform a Policy Framework for the Development of District Heating in Ireland.

➤ **District heating**

The six countries in the European Union with the highest levels of renewable heat have very significant amounts of district heating which delivers a large share of their RES-H (see next page from SEAI Energy in Ireland report).

District heating systems allow integration of largescale renewable energy and waste heat. They should be seen as critical infrastructure to decarbonising the heating sector, just as the EV charging infrastructure is critical for decarbonising transport.

The IrDEA Heat Atlas shows where district heating is suitable in Ireland and that, with the right supportive policy framework, it is capable of supplying 57 per cent Ireland's heat demand.



Recommendation: The department should ensure that waste heat can contribute to our renewable heat targets, and transpose Article 23 (4) (a) and (b) and commit to a 1.3% yearly average increase in renewable heating and cooling.

➤ **The Part L Building Regulations and associated DEAP software**

Currently the requirements for new dwellings, under Part L of the Building Regulations, require an energy performance (the EPC), carbon performance (the CPC) and renewable energy (the RER) target to be met.

There is a problem with having a carbon coefficient and a separate renewable energy requirement when utilising waste heat. Waste heat is not classified as renewable, but it is zero-carbon as it has no fuel associated with producing it as it is a waste product of a primary process. IrDEA’s heat atlas has shown that there is more waste heat in Dublin than is consumed by all buildings, meaning district heating could supply the entire city with zero-carbon heat.

The EU RES directive allows waste heat to contribute to the RES-H targets. A dwelling which is supplied by a district heating scheme utilising waste heat will far over-achieve in terms of energy efficiency and carbon but will not meet the renewable energy element.

This means that you could have a near zero-carbon home – supplied fully with zero-carbon heat – but it will still require an investment in an on-site renewable technology to meet the RER threshold.

If carbon emission reductions are the primary driver of the building regulation, the assessment should be based purely on efficiency and carbon emissions.

Recommendation: Adjust the Dwelling Energy Assessment Procedure (DEAP), which produces the Building Energy Rating (BER), to recognise that waste heat is zero-carbon. In other words, a building with zero-carbon waste heat should meet the building regulations and/or have a very high BER rating so that buildings are incentivised to use district heating.

In closing, I would like to thank you for the opportunity to make a submission to this consultation and we would be happy to meet with you to discuss it in more detail at any time.

Yours sincerely,
Ms Marie Donnelly
Chairperson