

Reply form for Consultation for Expanding the Purpose of Existing Energy Levies

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Organisation :	Greenlane Technologies
Please identify your sector:	Renewable Energy (Renewable CNG from biogas)
What are your views on the objective of this proposal? Do you agree or disagree with it? Why?	The objective to: “ provide more flexibility in allocating existing funding to encourage, promote and support energy efficiency, energy conservation and the use of renewable sources of energy “ is not reflective of the urgency required in our times to address our response for halting climate change. This is an outdated objective and needs to be updated to align with the national and global challenge that has been agreed to from the Paris Climate change Conference in 2015. This objective is not specific, measureable, achievable, results orientated or time based. This objective needs to be more aggressive and challenging, particularly if more funding is to be sort. The status quo is not working; asking for more money to keep doing similar things appears flawed.
What do you think is the appropriate balance between ‘administrative simplicity/transparency’ and the ‘causer or beneficiary pays’ and ‘rationality’ criteria? Should more weight be given to one over the others?	Whilst the 30:50:20 rule is nice and simple, it may not reflect the ongoing requirements and thus there is a need to report and consult. Having a wider net for the recovery of levies will increase the amount of consultation required. It is important for EECA to listen to the market in which it operates, consultation does that.
Which option do you think provides the best balance?	Option 3
What is your preferred option?	Option 3
Why do you consider this the best option?	It allows additional funding from other energy sectors for EECA to redistribute to achieve energy reduction or reallocation to renewable energy.
Of the options you do not prefer, what issues or reasons do you think are most important for us to consider?	All energy users should be levied, renewable or non-renewable. This levy is not about incentivizing change but simply collecting funds from the sector being serviced by EECA.
Are there other options for providing transparency in the use of levy money (besides requiring annual consultation and reporting)?	Annual reporting is required, consultation needs to be appropriate in the eye of the levy contributors.