

# DECC Heat and Energy Saving Consultation

Responses for linn.rafferty@tiscali.co.uk

## Chapter 1 - Introduction

Q1. Do you agree with the level of ambition and the indicative pathway set out in this chapter? If not, why, and what alternative would you suggest?

Yes. I agree with the level and ambition and indicative pathway set out in this chapter. The key policy proposals, set out in this consultation, are far reaching and ambitious and I fully support this level of ambition. To achieve these ambitious targets, funding should be made available that is equal to the task, and should be continually reviewed.

Q2. Do you agree with the Government's policy approach set out in paragraphs 1.31 to 1.49 to achieving our ambitions on heat and energy saving?

Yes. In particular, the challenge of raising awareness of the help on offer and engaging householders will be difficult, but essential. The whole-house approach tailored to each property, starting with a full energy audit of the householder's use of energy, is at the heart of both engaging the householder and making recommendations for saving energy and carbon in the home.

## Chapter 2 - Helping people change behaviour and take action

Q3. How can the Government encourage people and communities to change behaviour to save energy? What is the appropriate balance between changing attitudes, and providing advice and information?

I speak as an experienced energy adviser and Domestic Energy Assessor, who was part of the Energy Advice Providers Group (part of the Energy Efficiency Partnership for Homes) for almost 10 years. As a result I have a good understanding of what motivates householders to take action in reducing energy use and carbon emissions. The consultation recognises a number of barrier which must be tackled. A major factor is the reluctance of householders to invest time and money on this issue. We need to take action to address the challenge of engaging householders. The consultation proposes to make face-to-face, in-house energy advice widely available, and I support this. According to previous studies, Energy Advice works: see Energy Efficiency Partnership for Homes: "energy conscious behaviour saves money", ref EP24 published March 2005. This may be downloaded from <http://www.goodenergyadvice.org.uk/index.aspx> These same studies show us what form of energy advice works best in motivating householders to take action. The best format for providing effective energy advice is a home visit, specifically for the purpose of delivering energy advice: the advice should not be peripheral to the main purpose of the visit. The very best energy advice is delivered in a home visit; is personal to the home and its occupier; is supported by written information that summarises the advice given; and is followed up afterwards. All of this informed the production of the Code of Practice for Domestic Energy Advice, which I helped write, and which is now maintained and operated by the Energy Saving Trust. More information on the Code is available at <http://www.goodenergyadvice.org.uk/> National Occupational Standards have now been developed that closely match the requirements of the Code of Practice. These NOS will form the basis of a new qualification for Housing Energy Advisers. Providing advice is very different from providing information; advice is personal to the recipient and as a result is highly valued and more likely to be acted on. Qualified individuals who are able to provide the best, most effective type of home energy advice, must be at the heart of the new Heat and Energy Saving Strategy.

Q4. How can home energy audits be made most useful, and do you agree that the Government should use Domestic Energy Advisors, who have been suitably trained, to deliver them as widely as possible?

Yes, Domestic Energy Assessors (DEAs), given suitable additional training and having achieved the necessary qualification, should be used to deliver Home Energy Audits as widely as possible. Government should also be aware that there are other possible candidates for this role, including existing energy advisers who may work for the ESTACs or for energy suppliers. Most of these advisers provide advice over the phone, but are certainly capable of being trained to deliver advice in the home. The qualification should be based on the National Occupational Standards (NOS) for Housing and Community Energy Advisers. No other qualification provides for the full range of competencies, knowledge and understanding. New qualifications are now being developed against these NOS and will be available shortly. Whilst Government should not restrict this role only to DEAs, it should ensure that those qualified as Housing Energy Advisors (HEAs) are as competent as a DEA in the energy assessment of dwellings. DEAs are able to assess the energy performance of homes via a property inspection. This provides the essential underpinning evidence that allows for good energy advice to be provided to the householder. As this is so important, it is a critical part of the section of the Code of Practice dealing with the provision of energy advice in the home. Energy advice provided without this underpinning information is likely to be regarded as imprecise, not appropriate to the householder's specific circumstances, not valued, and not acted on. Housing Energy Advisors should also be required to register with accreditation bodies, which provide both reassurance of the continuing competence of the HEA and a route for customer complaint. If the role of HEA is opened to non-DEAs, all HEAs should be required to register with accreditation schemes in a similar way to the mandatory DEA accreditation requirements.

Q5. Should the Government work with industry to develop accreditation standards for advice about, and installation of, energy efficiency technologies? What would be the best model for such a scheme, and why?

Advice about energy efficiency technologies should be given by Housing and Community Energy Advisers. Please refer to the Code of Practice for Home Energy Advice, which includes minimum standards for advice given by installers of energy efficiency measures.

Q6. Are the information, advice and support services provided by Government to businesses effective in encouraging them to reduce their energy use and their CO<sub>2</sub> emissions? What other types of support services are useful and how can these be provided cost-effectively? Is there scope to do more on behaviour change through businesses and their employees? Please support your suggestions with evidence.

No Answer

Q7. Are the existing commitments for public sector buildings sufficient for the public sector to fulfil its role in driving improvements and leading by example?

The current requirement for public sector buildings to display Energy Certificates should be enforced. It should in due course be extended to other buildings frequented by members of the public.

### **Chapter 3 - Financing energy saving and low-carbon energy**

Q8. What will be the most effective way for Government to develop RHI and FIT policy so that combined financing packages of insulation, renewable heat and small-scale low carbon electricity technologies might be offered?

No Answer

Q9. What action, if any, should the Government take to enable finance to be arranged for the higher cost energy efficiency and low carbon measures? Are there other options the Government should consider? Please provide evidence to support your response.

No Answer

Q10. What should the Government do beyond these initiatives to promote investment in energy saving and low carbon energy technologies in business and the public sectors?

No Answer

Q11. Should levels of support through the Renewable Heat Incentive vary by technology and/or customer group? Are there any other ways of differentiating levels of support under the RHI?

No Answer

Q12. How can we introduce the levy to fund the Renewable Heat Incentive so as to minimise suppliers' administrative costs and reduce uncertainty among suppliers of fossil fuels for heat?

No Answer

Q13. Do you think that financial institutions, such as banks or other loan companies, would be an effective way of assisting potential small-scale heat generators (such as householders) with financing of the initial capital cost of renewable installations? What other considerations, if any, should be taken into account when determining eligibility for an up-front payment (for example, only generators with equipment below a certain size can apply, such as domestic customers)?

No Answer

Q14. How can we maintain demand for renewable heat technologies before we introduce the Renewable Heat Incentive?

No Answer

## Chapter 4 - Delivery

Q15. Do you agree with the proposal to continue with a CERT-type obligation until at least 2012? Do you also agree that the proposed CESP framework should run concurrently to the same end date?

Yes - the continuation of CERT, concurrently with the new CESP scheme, is the best option for the immediate future, but the effectiveness of these schemes could be compromised by inadequate funding, or by not applying appropriate minimum standards for the energy advice they provide. Minimum standards must be set based on the Code of Practice and should include the requirement to use qualified and accredited Housing and Community Energy Advisers. Government should consider introducing the new strategy, replacing CERT and CESP, at an earlier date in the light of experience.

Q16. Do you agree with our analysis of the potential impacts of a cap-and-trade approach to delivering energy efficiency in homes? Please support your answer with evidence.

No Answer

Q17. Do you have views on the merits of moving to a different delivery approach for delivering energy efficiency to households? Do you have other suggestions of alternative delivery models which might be effective in achieving our objective?

The Canadian example making use of a before and after home energy audit has merits, including that of using existing systems. In the UK, this could easily be accomplished using Housing Energy Advisers to carry out the assessment, using either RDSAP as used in the Energy Performance Certificate, or a simplified (sub-RDSAP) system.

## Chapter 5 - Stronger incentives to move to a low carbon future

Q18. Would you support a voluntary code of practice on energy performance for landlords and/or builders? How high do you think uptake would be, and would it achieve much additional action? Please support your response with evidence.

Yes. Again please refer to the Code of Practice for Home Energy Advice, which provides a model for a voluntary code. After a period where the code is voluntary, Government should consider mandatory requirements.

Q19. Should we require marketing material for property sales and rental to feature the EPC rating more prominently? If so how? What delivery bodies or industry groups could be given access to the EPC database, and how could they make best use of it whilst ensuring that it is not misused? Should we require an EPC to be obtained during major building work? If so, what types of work should trigger such a requirement? Please support your answers with evidence.

Yes. There is a clear role for the EPC in driving improvements to the existing housing stock and all opportunities should be taken to benefit from its use, including during major building work on existing homes. At the last review of Part L, consideration was given to the requirement for an RDSAP assessment triggered by particular building work, with a requirement to include the low cost recommended measures as a condition of approval for the work. The previous objections to this, relating to possible lack of capacity and customer resistance, are no longer relevant or significant: this should therefore be reconsidered.

Q20. Besides removing the threshold for consequential improvements, which will be considered in the consultation on changes to the Buildings Regulation in 2009, are there any other options for wider building regulation that you would like to see considered in the longer term? Please support your answer with evidence for the effectiveness of your suggestions.

No Answer

Q21. Do you agree with the approach of conducting a review in 2012 to assess the effectiveness of other policies before considering further policy interventions for the energy performance of existing buildings? Are there other options you think should be part of our strategy? Please support your answer with evidence.

No Answer

## **Chapter 6 - District heating**

Q22. Do you agree that the heat markets forum should consider regulatory arrangement for district heating to ensure consumer protection? Are there specific issues you think it should cover?

No Answer

Q23. There are a number of ways to tackle commercial barriers to district heating. These include using the planning system and heat mapping, encouraging or requiring certain buildings to connect to networks and engaging property developers. Which of these options should be taken forward and why?

No Answer

Q24. What are your views on the options for reducing the risks of poor returns on investment in district heating networks? Which do you think would be most effective and are there other more appropriate solutions?

No Answer

## Chapter 7 - Combined heat and power and surplus heat

Q25. Will the ETS and other policies, such as the Carbon Reduction Commitment and support for renewable CHP, send a strong enough signal to encourage the development of combined heat and power schemes and more efficient use of surplus heat? If not what measures do you believe would provide sufficient stimulus to accelerate new CHP capacity build? Can you provide evidence to support your view?

No Answer

Q26. As electricity generation overall becomes much less carbon intensive than today, the advantages of CHP powered by fossil fuel in reducing carbon emissions will diminish, although it will continue to be a cost-effective energy efficiency measure. When do you think CHP powered by fossil fuels will no longer help to reduce emissions because the alternatives are less carbon intensive?

No Answer

Q27. Should the Government do more to publicise the opportunities and benefits of CHP and surplus heat. If so, how should it do this, and which are the key audiences we need to reach?

No Answer

Q28. Do you consider such cooling technologies can play a role in delivering a renewable and low carbon energy mix? What opportunities exist for their exploitation in the UK? What further factors do we need to consider?

No Answer

## Chapter 8 - Wider impacts

Q29. Do you agree with our analysis of the likely impacts of the proposals in this document and in the associated impact assessments on:

carbon dioxide emissions?

energy prices?

fuel poverty?

security of supply?

sustainable development?

the economy?

Are there any other wider issues that we should consider? Do you have any other comments on the Impact Assessments?

No Answer

## About You

Q1. Name

Linn Rafferty

Q2. Location

East Midlands

Q3a. Organisation

JTec Services

Q3b. I am responding on behalf of my organisation

No

Q3c. Sector

Energy Industry

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