

JTEC Services

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Please find below the response to the CERT uplift consultation from JTec Energy and Automation Services

Comments should be sent to:

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Introduction to JTec Energy and Automation Services

JTec Energy and Automation Services, also known as JTec Services, delivers technical consultancy on energy efficiency. This response has been prepared by Linn Rafferty, an acknowledged expert in home energy advice and energy assessment, with 15 years experience in domestic energy efficiency.

Ofqual has recently approved a new qualification covering home energy advice – the ABBE level 3 Award in Home Energy Advice. This is a theory award, covering the essential knowledge and understanding required to deliver effective home energy advice, as defined in the National Occupational Standards for Home Energy Advisers. As such, it provides an alternative to the unaccredited City and Guilds 6176 award in Energy Awareness.

JTec Services believes that providers of energy advice within CERT should have the option to choose from more than one qualification provider, and the new ABBE award provides that choice. The current situation, where the City and Guilds 6176 is named as a passport qualification, but the ABBE award is not, is not equitable and should not be allowed to continue. This is especially undesirable, as the City and Guilds 6176 is not based on the National Occupational Standards for Home Energy Advisers, which have recently been named by DECC as the most appropriate basis for qualifications for Home Energy Advisers.¹

As a result we wish to express our view on some parts of this consultation where we have specific expertise. Where not listed below, JTec Services has no view on the consultation question.

ABBE's response to the consultation on extension of CERT

1 answers to consultation questions

Question 1. Do you agree that there should be an extension to CERT rather than a new obligation period?

Answer No

¹ DECC Household Energy Management Strategy
http://www.decc.gov.uk/en/content/cms/what_we_do/consumers/saving_energy/hem/hem.a_spx

Home energy advice has recently been added to the available options within CERT, and JTec Services understands that the relevant Statutory Instrument names the City and Guilds 6176 qualification as the minimum requirement for Home Energy Advisers. Any extension to the current scheme would continue the inequity, outlined above, of allowing an unaccredited qualification from one awarding body to continue as the passport qualification, when a better equivalent, accredited by Ofqual, is now available.

Question 3. Do you agree that under the CERT extension there should be a requirement for ensuring a proportion of the Priority Group target to be delivered to a subset of the most vulnerable customers?

Answer Yes, but we do have views on this.

We support the intent to define a Super Priority Group. It should be defined to identify the real fuel poor.

Question 4 Do you agree that Pension Credit recipients should be at the heart of the Super Priority Group?

Answer: Yes, but we do have views on this.

Paragraph 3.9 comments that there is currently no single mechanism or proxy that allows us to identify a Super Priority Group comprising only those in fuel poverty. We do not accept that there is no single mechanism for identifying only those in fuel poverty. Whilst using income as a proxy for fuel poverty, rather than the receipt of benefits, will more closely align the priority group with the real fuel poor, it does not recognise that fuel poverty is created by a combination of two things: low income and poor energy efficiency, as evidenced by low SAP ratings. An assessment of the home's energy performance, together with the income of the occupant, forms a basis for an assessment of fuel poverty. An inspection of the home based on RdSAP could be delivered by a qualified Home Energy Adviser, whilst at the same time the client would receive Home Energy Advice. All clients being assessed for membership of the Super Priority Group would therefore receive the benefit of home energy advice, whether or not they were found to be entitled to be included in this Group.

Question 6 Do you agree that we should introduce a limited list of heating and insulation measures?

Answer: Yes, but we do have views on this.

Unless it were carefully drafted, there could be unintended consequences. For example, it would not be acceptable if this were to prevent the provision of energy advice or Real Time Displays as a stand alone measure.

Provision of energy advice should be the starting point for all clients; if the client's property is found to be unsuitable for installation of the significant, and therefore listed, measures, this should not prevent them receiving energy advice or a Real Time Display.

Question 7. Do you think that the options and incentives proposed will encourage more help to rural households? What else can we do?

Answer: Yes, but we do have views on this.

Recent research² has confirmed the higher prevalence of fuel poverty in rural areas - 14.6% of rural households were fuel poor in 2005, compared to the national average of 7%. Unfortunately, energy efficiency improvements in rural areas are generally much more expensive per tonne of carbon saved. This may be why they are not favoured by the energy suppliers within CERT. Ofgem should therefore 'ring-fence' a proportion of the CERT target, to be obtained only from delivering these more expensive measures in rural areas. Such measures could include, for instance, Heat pumps; External Wall insulation, home energy advice and Real Time Displays.

² Understanding the real depth and impact of fuel poverty in rural England, a project by the Rural Services Network for the Commission for Rural Communities

Question 9. Do you agree with proposals for setting an insulation minimum and removing CFLs?

Answer YES

Question 12. Do you agree with proposals that only the most energy efficient products and appliances should be eligible measures?

Answer YES

Question 16. Do you think that the current reporting and monitoring arrangements are robust enough?

Answer NO

Recent reporting³ has highlighted the lax regulation of the current scheme, which allowed suppliers to achieve their carbon savings by issuing unwanted CFLs at a low cost per tonne of estimated carbon saved. At the same time, only one third of the target estimated number of CWI installations was achieved. Closer monitoring of the work carried out could avoid such shortfalls. Robust reporting will also be helpful in enabling lessons to be learned from CERT to inform the Household Energy Management Strategy.

Monitoring should capture data on actual savings achieved. Under the present arrangements, carbon savings are claimed for installations based on a simplified estimate of typical savings from a standard house type. An RdSAP inspection, which may be delivered by a Home Energy Adviser, would allow a much more accurate assessment of the carbon savings achieved in a specific home. Ofgem should mandate a standard method for assessing the savings from installed measures. This would be consistent with Unit 5 of the NOS for Home and Community Energy Advisers, and should make use of the RdSAP assessment methodology.

³<http://www.guardian.co.uk/business/2010/mar/07/energy-lightbulbs-wasted-lax-regulation>