

JTEC Services

JTec Energy Performance

linn.rafferty@tiscali.co.uk

07807 550915

JTec Automation

john@rafferty.screaming.net

07989 346622

Response to the consultation on the Community Energy Saving Programme from Linn Rafferty, DEA and independent consultant

Linn Rafferty is an accredited, independent Domestic Energy Assessor who has 12 years experience in the area of energy performance in buildings and provision of home energy advice. She was a member of DIAG (the Directive Implementation Advisory Group, set up to advise government on the implementation of the Energy Performance Directive) and helped to develop the Code of Practice for Domestic Energy Advice. Her response to this consultation is informed by her experience in the development of training, assessment and accreditation in this area, and provides input specifically related to the provision of Home Energy Advice in CESP.

Summary

Provision of advice by well qualified individuals is central to achieving the Government's targets for carbon reduction. I worked with others to develop the Code of Practice for Domestic Energy Advice, intended to promote good practice, and built on extensive research that showed what methods achieved results. However, good practice is expensive, and as a result, the standards in the Code have not yet been mandated, nor has the Code itself been supported by any policing.

We are now at a stage where Government has the opportunity to mandate good quality energy efficiency advice provided by well qualified advisers, and this opportunity should be taken. The National Occupational Standards for Housing and Community Energy Advisers have been created specifically to underpin new qualifications for such advisers, taking note of the requirements of the Code of Practice and other applicable standards and qualifications. New qualifications for both Housing and Community Energy Advisers are now in development, which will prepare candidates for important roles in the Community Energy Saving Programme. Once qualified, advisers should be required to join an Accreditation or Certification Scheme. The accrediting body should be tasked with maintaining high standards, consistent with those contained in the Code of Practice. This will promote confidence in the validity of the advice given and encourage householders to act on that advice.

CESP Consultation Questions

Statutory Instrument

Q1 Do you have any comments on the draft Statutory Instrument?

YES

The draft SI should require the provision of advice by a qualified, accredited Housing or Community Energy Adviser who will first conduct a Home Energy Audit including assessing the energy performance of the home.

Assessment of the energy performance of a home provides the essential underpinning evidence that allows for good energy advice to be given. This requirement, for a valid energy inspection of the property prior to giving advice, is a critical part of the section of the Code of Practice dealing with the provision of energy advice in the home. The Code requires this, for the very good reason that 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.

Provision of a Home Energy Audit will ensure that the home will be properly assessed for appropriate measures and the householder will receive advice on reducing energy use in the home.

JTec Services •

Tel • 01604 702815

Partners: Linn Rafferty & John Rafferty

Impact Assessment

Q2. Do you have any comments on the partial Impact Assessment?

YES

Page 71 questions whether households will be removed from fuel poverty. Provision of Home Energy Audits undertaken by a qualified, accredited Housing or Community Energy Adviser would allow a proper assessment of whether the occupier has been removed from fuel poverty.

Annex D recognises that the proposed scoring approach is vulnerable to delivering lower than anticipated savings. Provision of Home Energy Audits undertaken by a qualified, accredited Housing or Community Energy Adviser would allow a scoring approach based on SAP, removing the vulnerability described here.

Creating incentives

Q10. Do you agree that CESP should target fewer homes but provide greater CO₂ and fuel bill savings for homes targeted? If you do not agree, please explain your reasons and offer an alternative approach.

The community programme should adopt a whole house improvement approach, providing support for all measures appropriate to the house. Providing only a small number of improvements, as for example in the Warm Front scheme, is not as cost effective as including all appropriate measures in a planned programme. The measures to be provided by the community scheme should be those that are identified in the Home Energy Audit, delivered by a qualified and accredited Housing or Community Energy Adviser.

Because this increases the average cost per property, the amount of funding provided should reflect the higher average cost per property.

Scoring

Q15. Do you agree with the proposed list of measures available under CESP?

YES

However, Home Energy Audits must be a mandatory part of the community programme. Currently they are mentioned in the text of the consultation document as available measures, which may not be sufficient to guarantee their provision to all homes included in the community programme. It would be preferable if provision of Home Energy Audits were mandated in all community schemes.

There are a number of reasons why Home Energy Audits should be mandated. Householders are naturally reluctant to accept anything that is offered to them for no cost, and this can make it difficult to achieve high participation rates. Provision of home energy advice can help to overcome this.¹ Home Energy Audits ensure that all measures appropriate to the dwelling are offered at once and provide for before and after assessment of the energy performance of the home. An audit methodology based on a BREDEM 12 assessment would also allow for the assessment of fuel poverty before and after installing measures, confirming whether the occupant has been removed from fuel poverty.

¹ This was recognised in the final report on the Energy Efficiency Partnership for Homes workshop on this consultation; see <http://www.eeph.org.uk/uploads/documents/partnership/CESP%20workshop%20report%20final1.pdf>

New qualifications are now being developed, founded on National Occupational Standards which have been specifically created for the roles of Housing and Community Energy Adviser. These standards build on current good practice in delivering energy advice in the home, with additional requirements covering the additional skills and knowledge required of a Community Energy Adviser. Energy audits within CESP should be delivered by qualified and accredited Housing and Community Energy Advisers using the Government approved methodology created for this purpose (RDSAP or a simplified derivative).

District heating criteria

Q18. Is it possible to attribute any base-line scores to particular types of scheme, or would this need to be on a case-by-case basis?

Scores for standard measures such as cavity wall insulation are based on simplified assessment of savings using a generalised model. This is considered adequate for such measures but to avoid inaccuracy, scores for savings for district heating would be better undertaken on a case-by-case basis. This can be provide via the use of Home Energy Audits using RDSAP or a simplified derivative. More accurate carbon dioxide emission savings could then be assessed by the Housing or Community Energy Adviser for the entire community group. SAP (and RDSAP) uses standard occupancy to avoid the effect of the current occupiers use of the property masking the overall savings.

Creating incentives for a whole-house approach

Q19. Do you think our proposed bonuses for scoring measures encourage the delivery of a whole-house approach? If not, please explain why and offer an alternative set of incentives.

NO

The proposed method for encouraging a whole house approach simply rewards the installation of more measures, regardless of their effectiveness. A better alternative would be to require the measures to achieve a minimum SAP value. This could be achieved via the use of Home Energy Audits using RDSAP or a derivative, delivered by qualified, accredited Home and Community Energy Advisers.

Calculating bonuses

Q20. Do you agree that this scoring system will encourage the delivery of measures that will meet the CESP objectives of reducing CO₂ and fuel bills? If not, please explain your reasons and offer an alternative methodology.

NO

Significant bonuses have been proposed for solid wall insulation measures, leading to the risk that cavity wall and loft insulation may be less attractive. A bonus which was available only if the installed package included all of the lowest cost measures recommended by the Home Energy Audit, would ensure that CWI and loft insulation would always be provided where applicable. Again, this would be achievable via adoption of Home Energy Audits using RDSAP or a derivative.

Delivering intensive action in specific areas

Q22. Do you think any of the described options will deliver intensive action in specific areas? If so, which option do you favour? If not, please explain your reasons and offer an alternative.

YES

Of the options suggested, the third option for an energy audit score may provide a basis for an incentive. An incentive based on the average SAP score achieved across all properties, or perhaps on the average improvement in SAP score, would be independent and is achievable via the provision of Home Energy Audits to all properties.

Linn Rafferty, DEA and independent consultant

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