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Mr R Moore
Energy Performance of Buildings Directive Team
Department for Communities and Local Government
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Dear Robert

The Next Steps: EPCs and the establishment of the Green Homes Service

The Energy Saving Trust is pleased to respond to the consultation on the next steps for EPCs and strongly supports the proposals to make EPCs more accessible and more effective as a catalyst for behaviour change. Not to do so would be a major missed opportunity.

The Energy Saving Trust was set up by the Government following the 1992 Rio Earth Summit and is one of the UK's leading organisations addressing the damaging effects of climate change. The Energy Saving Trust's goal is to achieve the sustainable and efficient use of household energy, transport and water and to reduce household waste in order to cut carbon dioxide emissions, one of the key contributors to climate change. Please note that this response does not necessarily represent the view of Energy Saving Trust members.

a) Giving the EST access to domestic EPCs as part of implementing the Green Homes Service

The Energy Saving Trust welcomes and wholeheartedly supports the proposals to widen access to EPCs as an important step forward in providing data to develop, monitor and evaluate policy and other initiatives. As you are aware, we are currently in the process of rolling out the Green Homes Service where the proactive targeting of poorly performing homes using EPC data is a key activity, which requires access to the domestic EPC register.

We estimate that the average household could save £270¹ per year by making their home more energy efficient and by adopting straightforward behavioural measures. Savings for those in worse performing homes are likely to be even higher. Data from the Landmark Information Group indicates that at present some 11% of properties with RdSAP EPCs fall into the worst performing, F and G rated bands for energy efficiency. Householders moving into these homes will be provided with customised advice based on their EPC and the Energy Saving Trust advice centres will be on hand to provide follow up advice and assistance with grants and other support to encourage the uptake of the EPC recommendations provided.

¹ This excludes the recent price rises of over 30% in gas in some cases and up to 17% for electricity from the major energy suppliers. We are updating these figures accordingly.

The underlying data from EPCs will also be loaded into the Energy Saving Trust's Homes Energy Efficiency Database (HEED). HEED is unique; a comprehensive repository of data and information describing the sustainable energy characteristics of the UK housing stock. It currently contains data describing approximately 8 million homes incorporating data from a wide range of sources including Energy Saving Trust activity, the Government's fuel poverty and microgeneration programmes such as Warm Front and the Low Carbon Buildings Programme, the Energy Efficiency Commitment/Carbon Emission Reduction Target obligated energy suppliers, local authorities, as well as industry datasets such as those sourced from CIGA, Corgi and FENSA.

HEED offers UK Government a means to readily assess and analyse energy efficiency data and information. The potential that the database offers has been noted in the recent Defra report "*Energy Services Directive – Data Requirements Report*"². This recognises the importance of integrated data for the development, implementation, monitoring and evaluation of policy and supporting initiatives. Wider access to EPC data is a requirement for this and is noted in the reports. Following on from the report's recommendations, the Energy Saving Trust is currently working with Defra and BERR on a pilot programme to use HEED to analyse and profile meter point gas and electricity consumption.

There is also considerable demand from local authorities and others to access EPC data for HECA, NI 186 reporting and other purposes. HEED is perfectly placed to assist with the controlled dissemination of data and information. All data whilst stored at individual address level is aggregated so that data is only released at a statistical level. The database has in excess of 280 registered users (local authorities, regional/central government and energy suppliers) and is seen by its user base as the central vehicle for the storage and distribution of sustainable energy data.

In future, HEED also offers the possibility to assist Domestic Energy Assessors (DEAs) with the assessment of homes as HEED collects data from a range industry sources which could be provided to DEAs in advance of the EPC assessment. For example, data from the Cavity Insulation Guarantee Agency (CIGA) could, via HEED, be used to check for the presence of retrofit cavity wall insulation and assist EPC preparation. Especially as it can be difficult to identify where retrofit insulation has been installed. HEED also has similar data from FENSA who register the installation of post 2002 replacement windows/doors and Corgi who record details of gas installations.

b) Giving the Carbon trust access to non-domestic EPCs

We are not aware of a non-domestic analogue to HEED operated by the Carbon Trust, but would support this proposal as it will improve the availability and understanding of the energy performance of the non-domestic stock. Access to the non-domestic register will be crucial to assist the monitoring of performance towards the aims of the Energy Services Directive.

c) Allowing energy assessors to search the domestic register by address as well as by reference number to give them more flexibility in carrying out their work

We welcome this proposal and are supportive of the need to make EPCs easy to update. If the underlying EPC data were made available to DEAs, mechanisms would need to be in place via accreditation schemes to ensure that the properties were actually surveyed and the data not simply re-hashed to produce a new EPC.

d) Allowing search of the commercial register by address to know whether a given building has an EPC, although not permitted to download it

We support this proposal in principle.

Proposed safeguards on access to the registers

² <http://www.defra.gov.uk/environment/climatechange/uk/energy/energyservices/documents/data-requirement-report.pdf>

We believe that the safeguards proposed are sufficient. The Energy Saving Trust will be bound by an agreement with Communities and Local Government as to the terms of use of EPC data. Also, the Energy Saving Trust is experienced in handling and storing data in professional, competent and secure manner. This is further demonstrated by the fact that the Energy Saving Trust is operating the central register for residential EPCs on behalf of the Scottish Government.

Please contact me if I can be of further assistance, meanwhile I look forward to increasing the effectiveness of EPCs in the future.

Yours sincerely

Brian Samuel
Head of Policy Research