

Domestic Assessment and EPC Team  
Scottish Government  
5 Atlantic Quay  
Glasgow, G2 8LU

15 October 2021

### **Consultation response: Domestic Energy Performance Certificates (EPC) reform**

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy transition. We represent around 260 organisations across the full range of renewable energy technologies in Scotland and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain.

Scottish Renewables welcomes the opportunity to provide our views on the Scottish Government's current thinking on Domestic EPC Reform, as set out in the consultation document.

In responding, we would like to highlight the following points:

We are generally supportive of the Scottish Government's plans to reform domestic EPCs. The current EPC is not designed to support the journey to net zero and is not a useful mechanism to help occupants in improving their homes in a meaningful way.

We understand that this consultation is not trying to change the methodology, however, the concern remains, that SAP and RdSAP are based on standardised assumptions and not real data.

We agree with the name changes proposed in the consultation – with the EER rating becoming the Energy Cost Rating and the EIR rating becoming the Carbon Emissions Rating. This language actually explains what the ratings mean and is much more accessible to consumers.

We are happy to see that EPCs will be reformed to give credit for low carbon heat installations, such as heat pumps, via the Carbon Emissions Rating.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

Helen Melone  
Senior Policy Manager  
Scottish Renewables

## **1. Do you agree or disagree with the addition of the proposed Energy Use Rating?**

**Please explain the reasons for your answer.**

### **General points:**

Scottish Renewables is generally supportive of the Scottish Government's plans to reform domestic EPCs. The current EPC is not designed to support the journey to net zero and is not a useful mechanism to help occupants in improving their homes in a meaningful way.

This consultation is a useful first step towards improving EPCs and in making the associated data more accessible.

While we are generally supportive of the approach in this consultation – i.e., using three metrics:

- Energy Use Rating
- Carbon Emissions Rating
- Energy Cost Rating

as we believe it provides a more understandable picture - we are concerned that this could be confusing for lay people who (at best) are only interested in what is the rating of their home. However, we note that this is the subject of a further consultation.

### **Question 1: 1. Do you agree or disagree with the addition of the proposed Energy Use Rating? Please explain the reasons for your answer.**

Scottish Renewables supports the addition of the proposed Energy Use Rating (kwh/m<sup>2</sup>/yr). However, while this could provide a clearer indicator of the energy performance impact of any improvement measures (as fuel prices vary and emissions alone do not provide a clear picture of impact) this will only really inform decisions on energy use and reducing demand if it relates to real or more accurate data.

We understand that this consultation is not trying to change the methodology, however, the concern remains, that SAP and RdSAP are based on standardised assumptions and not real data. The fact that EPCs in no way relate to actual fuel bills remains an issue for home occupants. We accept that SAP is not intended to be an accurate reflection of energy use in reality, but there either needs to be a complete separation between SAP and actual running costs or the two need to be brought closer together. One might ask 'what is the point of the Energy Use Rating?' as it could add to confusion if people believe it has been introduced to reflect actual fuel use – so the purpose of the Energy Use Rating needs to be clear.

Could the second stage assessment could look at real fuel use to see what recommendations would be most beneficial to the householder?

**2. Do you agree or disagree with the name changes of the current EPC Energy Efficiency Rating & Environmental Impact Rating to Energy Cost Rating and Carbon Emissions Rating respectively? Please explain the reasons for your answer.**

Scottish Renewables agrees with the name changes proposed in the consultation – with the EER rating becoming the Energy Cost Rating and the EIR rating becoming the Carbon Emissions Rating. This language actually explains what the ratings mean and is much more accessible to consumers.

Both ratings are important:

- Energy Cost Rating - so that the occupant understands the impact of fuel or measures on their running costs and so that the Scottish Government (and delivery agencies) understand the impact on/risk of fuel poverty;
- Carbon Emissions Rating - so that both the occupant and government programmes understand if changes to the property/ energy system are addressing Climate Change Plan targets.

We are happy to see that EPCs will be reformed to give credit for low carbon heat installations, such as heat pumps, via the Carbon Emissions Rating. This could be a model for EPC reform in the rest of the UK.

**3. Do you agree or disagree that the proposed EPC format will better equip building owners and/or occupiers to make informed decisions about improvements and/or changes to the energy efficiency and heating systems of their building? Please explain the reasons for your answer.**

We agree that the three ratings with the new names provide clearer information and assist comparison, but they are valuable to occupants only if the baseline is clear in terms of their relationship with actual energy consumption. We do not expect this to be an overnight change – but we need to be able to explain the discrepancy in a meaningful way.

**4. Do you agree or disagree with retaining the information outlined in section 5? Please explain the reasons for your answer.**

While we are encouraged by the suggestion that another consultation will look at a ‘wider assessment process’ which will sit in parallel with the EPC assessment, and that this will be subject to consultation, we do not agree with the retention of the information outlined in Section 5 unless it is part of a complete overhaul in terms of how the information is derived.

Our reasons are set out below:

Issues around alignment of the ‘Recommended measures’ and ‘Energy performance related features’ regarding accuracy and alignment with net-zero have also been identified, it is important to avoid building in or retaining existing anomalies and inaccuracies. This is

particularly true of renewable energy systems, electricity generated by renewables and some innovations.

The 'Estimated energy costs' bear no resemblance to actual running costs under the present system. Retaining this section reinforces an existing area of confusion until the next system overhaul. We think that this is unacceptable.

Further, if the current additional information on 'Recommended measures' and 'Your home's heat demand' is retained there is a significant risk of confusion for householders if the second stage assessment is carried out separately. It would serve a more useful purpose if occupants opting for the second stage assessment were able to bypass the generic option to go straight to the personalized/ optimized assessment.

We believe that both in terms of presentation and value to the customer, this whole section requires a re-think.

**5. Do you think any additional information should be added to the EPC format? Please explain the reasons for your answer.**

A route map to Net Zero – thus avoiding undoing staged improvements, linked to the staged targets would be valuable and add logic.

**6. How do you think the metrics should be presented on the EPC? (More than one answer can be selected)**

- Graph (current EPC ratings)**
- Diagram**
- Sliding scale**
- Text only**
- Other format**

**Please explain your choice(s).**

Because of its use on white goods, etc., the current EPC rating system is familiar and easy to understand – people know what it means even if the figures do not relate to real life.

While the three separate ratings are valuable for comparison, they may be confusing for the occupant, who will only be interested in the rating of their home.

**7. Are there any other comments on the proposed EPC format you would like to add?**

We would like to make this much stronger and focussed on renewables, especially solar, so that the changes to EPC can encourage more uptake of renewable technologies, and homeowners/occupiers can benefit from installing renewables and this being reflected in their rating.