

REFORMS OF ENERGY PERFORMANCE REGIME – CONSULTATION RESPONSE (DEADLINE: 26 FEB)

Question No.	Question	Theme	Response options (if applicable)	Additional text	Response provided by
1.	To what extent do you agree or disagree that information using an energy cost metric should be displayed on EPCs? Please select one option for each building type.	Energy cost	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Agree	Given the current inaccuracies inherent in the EPC system, the cost metric does not provide useful data for consumers. This means that any improvements to building fabric will not affect the energy bills of the resident in the way which they expect. Improving the accuracy of this measure would help.	
	Non-domestic buildings		Disagree	Energy costs can fluctuate widely depending on market conditions, building usage, and geographical location. It may be	

				difficult to provide a single cost estimate that accurately reflects the energy expenditure for all non-domestic buildings, potentially making the information misleading or outdated.	
2.	To what extent do you agree or disagree that information derived from a fabric performance metric should be displayed on EPCs? Please select one option for each building type.	Fabric performance	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Strongly Agree	By splitting the improvements between fabric and other improvements the property owner/resident receives better information as to where the most efficiency gains can be found, and where funds are best invested.	
	Non-domestic buildings		Agree	information derived from a fabric performance metric should be included on EPCs for non-	

				<p>domestic buildings, but with some qualifications. It should not be the sole focus but rather part of a broader set of metrics that gives a comprehensive picture of energy efficiency. Including fabric performance could help users understand one of the most important aspects of building energy use. However, care should be taken to present the information in a way that is understandable and balanced, with clear explanations and alongside other important performance indicators.</p>	
3.	<p>When evaluating the fabric performance of buildings, which methodology do you think should inform the basis of calculating a fabric metric? Please select one option for each building type.</p>	<p>Fabric performance</p>	<p>No preference Don't know FEES HLP/HTC Other</p>	<p>Please insert any additional comments in the relevant spaces below</p>	

	Domestic buildings		FEES	This should address some of the inaccuracies currently built-in to the assessment process.	
	Non-domestic buildings		FEES	FEES as the primary methodology for a fabric metric, as it directly aligns with sustainability goals and energy efficiency outcomes.	
4.	To what extent do you agree or disagree that information based on a heating system metric should be displayed on EPCs? Please select one option for each building type.	Heating system	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Agree	Understanding how heating systems affect a property's efficiency is essential to building an upgrade plan.	
	Non-domestic buildings		Agree	A heating system metric should be displayed on EPCs, but with conditions. Heating systems are a significant part of a building's overall	

				energy efficiency, and showing their performance could provide valuable insights. However, the information should be presented in a way that is accessible and meaningful to users, avoiding oversimplification and ensuring it doesn't overshadow other critical aspects of the building's energy performance.	
5.	What are your views on the design principles and the scope for a Heating System metric? Please provide evidence where possible.	Heating system	N/A	Please insert any additional comments in the relevant spaces below	
	Domestic buildings			The current system which favours highly efficient fossil fuel systems needs to be addressed to reduce this bias, and increase the impact of installing low-carbon alternatives.	
	Non-domestic buildings			The key to development of useful metrics that will be designing a metric that is clear,	

				actionable, and easy to understand, without overwhelming users with technical details. The scope should balance the need for comprehensive data with the complexity of heating systems, and it should integrate well with the broader EPC, presenting a holistic view of the building's energy efficiency.	
6.	To what extent do you agree or disagree that information based on a smart readiness metric should be displayed on EPCs? Please select one option for each building type.	Smart readiness	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Disagree	We do not feel that this would have a significant impact on the measures applied to building. Nor does it have an impact on the efficiency of a property. This may add a level of confusion which	

				would place a further barrier to works.	
	Non-domestic buildings		Disagree	The disparities in access to smart technologies and standardisation of technologies means this may not be useful and may be easy to misinterpret.	
7.	What are your views on the definition, design principles and the scope for a smart readiness metric? Please provide evidence where possible.	Smart readiness	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Neither agree nor disagree		
	Non-domestic buildings		Neither agree nor disagree		
8.	To what extent do you agree or disagree that information from an energy use metric should be displayed on EPCs? Please select one option for each building type.	Energy use	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Agree	As mentioned previously this would be improved by addressing some of the inaccurate	

				sections of the assessment.	
	Non-domestic buildings		Agree		
9.	If an energy use metric is to be displayed on Energy Performance Certificates (EPCs), which type of energy use measurement should be used to calculate this metric? Please select one option for each building type.	Energy use	No preference Don't know Delivered energy Primary energy Other (please specify)	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Other – both	Using primary energy alone puts the onus of reduction unfairly on the consumer. Using delivered energy alone only shows the customer what they are using. By combining the two the customer gets to understand the inefficiency of delivery and puts pressure on energy suppliers to improve this figure.	
	Non-domestic buildings		Other – both	If the EPC's goal is to provide a transparent and actionable energy use metric for the building's occupants,	

				<p>focusing on delivered energy is likely the most practical option. It directly affects operational costs, is easy to measure, and is relatable to the average user.</p> <p>However, for a more comprehensive understanding of a building's environmental footprint and sustainability, using primary energy would provide deeper insights into the true energy efficiency of the building's operations. This would be especially beneficial in the context of long-term sustainability goals and the transition to a low-carbon economy.</p>	
10.	To what extent do you agree or disagree that information from a carbon based metric should	Carbon	Strongly disagree Disagree	Please insert any additional comments	

	be displayed on EPCs? Please select one option for each building type.		Neither agree nor disagree Agree Strongly agree	in the relevant spaces below	
	Domestic buildings		Strongly Agree	Again this would be improved by an improvement in assessment accuracy. Including a carbon (CO2e) metric allows a resident to examine the wider impact of improvement works, and identify which measures will reduce CO2e output, if any.	
	Non-domestic buildings		Strongly agree		
11.	To what extent do you agree or disagree with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings? Please select one option for each building type.	SMETER methods	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Domestic buildings		Neither agree nor disagree	We do not feel that the SMETER technical evaluation carried out in 2019-20 was of sufficient sample size (30 properties) or archetype variety to	

				draw a reasonable conclusion.	
	Non-domestic buildings		Neither agree nor disagree		
12.	Do you have any views on key transition issues?	Transition	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
	Non-domestic buildings		Neither agree nor disagree		
13.	What should be the validity period for Energy Performance Certificate (EPC) ratings?	Reducing the validity periods for EPCs	Don't know Less than 2 years 2 years 5 years 7 years 10 years	Please insert any additional comments in the relevant spaces below	
	Non-domestic buildings		10 years	Reducing this time puts additional costs on landlords without improving methods to address the issues identified.	
14.	To what extent do you agree or disagree with the approach for any changes to validity periods to only apply to new EPCs?	Reducing the validity periods for EPCs	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	

			Strongly Disagree	No changes should be made	
15.	To what extent do you agree or disagree that a new EPC should be required when an existing one expires for private rented buildings?	Requiring a valid EPC throughout the tenancy period	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Disagree	The current system of new EPCs at change of tenancy is reasonable.	
16.	To what extent do you agree or disagree that the regulations should be amended so that a property must have a valid EPC before it is marketed for sale or rent?	Marketing a building for sale or rent	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Agree	Possibility to stall sales if EPC not completed in a timely manner	
17.	To what extent do you agree or disagree that houses in multiple occupation (HMOs) which don't already fall under the (Minimum Energy Efficiency Standards) MEES should do so when a room is rented out?	Houses in multiple occupation	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Strongly Agree		

18.	To what extent do you agree or disagree that there should be a transitional period of 24 months to allow HMO landlords to obtain a valid EPC and comply with MEES regulations?	Houses in multiple occupation	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Strongly agree	This is required to prevent evictions	
19.	To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC at the point of being let?	Short-term rental properties	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Strongly agree		
20.	To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC irrespective of who is responsible for meeting the energy costs?	Short-term rental properties	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Agree	Help should be provided to landlords where required.	
21.	To what extent do you agree or disagree that we should remove the exemption for landlords from obtaining an EPC for buildings officially protected as part of a designated environment or because of their architectural or historical merit?	Heritage buildings	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	

			Disagree	The historical significance of properties should not be ignored, and the use of these properties should not be prohibited because of their energy use. However it may be reasonable to look at other methods to evaluate these properties which take this into account.	
22.	How useful do you find Display Energy Certificates (DECs) for understanding and improving a building's energy performance?	Display Energy Certificates (DECs)	Not at all useful Somewhat not useful Neither not useful or useful Somewhat useful Very useful	Please insert any additional comments in the relevant spaces below	
23.	Are there any limitations or challenges with the current DEC approach that reduce its effectiveness?	Display Energy Certificates (DECs)	Please provide evidence where possible	Please insert any additional comments in the relevant spaces below	
24.	What alternative approaches, if any, could drive energy performance improvements more	Display Energy Certificates (DECs)	Please provide evidence where possible	Please insert any additional comments	

	effectively than DECs for public sector buildings?			in the relevant spaces below	
25.	To what extent do you agree or disagree with the proposed changes to the validity periods for DECs and DEC recommendation reports?	Reducing the validity periods for DECs	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
26.	What would be an appropriate validity period in years for these DEC and DEC recommendation reports? Please select a validity period for each option.	Reducing the validity periods for DECs	1 year 2 years 3 years 4 years 5 years 6 years 7 years More than 7 years Don't know	Please insert any additional comments in the relevant spaces below	
	DEC 1000m ² and under				
	DEC recommendation report 1000m ² and under				
	DEC recommendation report over 1000m ²				
27.	There is a proposal to provide an exception in the regulations for certificates that have been marked as cancelled or not for issue to be	Cancelled or not for issue certificates	Strongly disagree Disagree	Please insert any additional comments	

	removed from the Energy Performance of Buildings (EPB) Register after 2 years.		Neither agree nor disagree Agree Strongly agree	in the relevant spaces below	
28.	To what extent do you agree or disagree with the approach to remove the option to opt-out EPCs from the EPB Register public address search?	Removing opt-out from the EPB regulations	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
29.	To what extent do you agree or disagree with retaining the option to opt-out EPC address level content from the Open Data?	Removing opt-out from the EPB regulations	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
30.	There is a proposal to remove the general prohibition on sharing data gathered under the EPB Regulations and replace it with a Secretary of State discretion about when, how and with whom to share the data.	Data sharing	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	

31.	To what extent do you agree or disagree that data gathered in previous EPC assessments should be available for use in future EPC calculations for a dwelling?	Using existing data in EPC assessments	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
			Agree	By comparing data from previous assessments the quality of both the new and previous assessments can be examined. It will also allow a real-terms analysis of any changes made over the period between assessments.	
32.	What are your views on the approach to using existing data, while balancing accuracy and practicality?		Views	Please insert any additional comments in the relevant spaces below	
33.	To what extent do you agree or disagree that Accreditation Schemes should be given more responsibility for overseeing the training of energy assessors?	Assessor fraud	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	

34.	Do you have suggestions for other actions which could be taken to improve the accuracy and quality of energy assessments, or to help identify fraud in EPC assessments?	Assessor fraud	Suggestions	Please insert any additional comments in the relevant spaces below	
35.	To what extent do you agree or disagree with these proposals to improve compliance?	Improved EPC compliance and enforcement	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
36.	To what extent do you agree or disagree that penalties should be increased?	Penalties	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
37.	If penalties were to increase, how much should current penalties increase by?	Penalties	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	

38.	When should penalties be imposed for non-compliance with Energy Performance of Buildings Regulations (EPBR) requirements?	Penalties	Don't know At 6 months (no increase) At 12 months At 18 months Following more than 18 months	Please insert any additional comments in the relevant spaces below	
39.	What are your views on changing the current allocation of responsibilities for enforcing Energy Performance of Buildings Regulations (EPBR)?	Enforcement authority responsibilities	Views	Please insert any additional comments in the relevant spaces below	
40.	There is a proposal for a new penalty charge fine amount of £800 for non-compliance with the requirement to have an ACIR for systems with an effective rated output over 12kW.	Issues with low compliance	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
41.	To what extent do you agree or disagree with the proposal to redesign the structure of ACIRs?	Redesigning ACIRs	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
42.	What should be included in a redesigned report?	Redesigning ACIRs	Views	Please insert any additional comments	

				in the relevant spaces below	
43.	To what extent do you agree or disagree with the proposal to add a cost metric in the assessment methodology for ACIRs?	Redesigning ACIRs	Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree	Please insert any additional comments in the relevant spaces below	
44.	If you agree to including a cost metric, what would be the most suitable data on air conditioning system output to use in the calculation and how could it be obtained? Please comment both on data quality, suitability and likely availability.	Redesigning ACIRs	Views	Please insert any additional comments in the relevant spaces below	
45.	If you agree to including a cost metric, what would be the most suitable data on electricity prices to use in the calculation? Please comment both on data quality, suitability and likely availability.	Redesigning ACIRs	Views	Please insert any additional comments in the relevant spaces below	
46.	Please let us know if you have any evidence on the rate of voluntary implementation of recommendations made in EPCs.	Additional questions	Views	Please insert any additional comments in the relevant spaces below	

47.	Please let us know if you have any comments on the regulatory or equalities impact assessments presented alongside this consultation, in particular, are there any impacts on groups with protected characteristics that we have not identified in the equalities impact assessment?	Additional questions	Views	Please insert any additional comments in the relevant spaces below	
48.	Please let us know if you have any comments on the impact assessment in general, including any evidence you have on the impact of these proposed reforms.	Additional questions	Views	Current EPC assessments are flawed, with assessors not noting a product if they are unable to actually see it, advising photo's will not be accepted. Recently we have been advised to install access panels to all rooms where floor, wall or ceiling insulation has been installed in order to form part of the assessment, this is a costly and unsightly exercise for little gain. Scores for measures on an EPC, should be shown throughout	

				<p>the certificates, so it is clear what measures installed and recommended are having the most impact, this will help making informed decisions. Current scoring system needs to be regularly updated and not so ridged, for instance currently based on 50mm, 75mm, 100mm, etc insulation, there are products on the market that are thinner and less intrusive that have thermal properties which should be considered.</p>	
--	--	--	--	--	--