

Carbon Emissions Reduction Target (CERT) 2008-2011 Supplier Guidance Amendments

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Overview:

This document sets out Ofgem's proposals for administering the amended Carbon Emissions Reduction Target (CERT) in line with the Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009. It explains what these amendments are and the details of how Ofgem intends to administer these. It also provides further clarification on some areas of the existing CERT Supplier Guidance

We are seeking comments on the issues set out in this paper.

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Context

Government has a range of policies to reduce the UK's carbon dioxide emissions by 80 per cent by 2050. Around a quarter of current emissions result from the energy used to heat and power our homes; this makes housing an area in need of significant attention. As such, the government recently published a consultation on their proposed heat and energy saving strategy, setting out an aim for emissions from existing homes to be approaching zero by 2050, and the policies that will allow the UK to achieve this.

The Carbon Emissions Reduction Target (CERT) is one of these policies, and is currently the government's main policy instrument for reducing carbon emissions from the existing housing stock. Under the CERT 2008-2011 obligated suppliers are set a carbon emissions reduction target. CERT is due to run from 2008-2011, and in September 2008 the Prime Minister announced an increased target and a new community based approach to carbon reduction. This new community approach is called the Community Energy Saving Programme (CESP), and will run alongside CERT in reducing fuel bills and carbon dioxide emissions.

For the purposes of this document, the programme itself will be referred to as the CERT and the target for carbon emissions reduction as the CER target. The Department of Energy and Climate Change (DECC) is responsible for setting the CER target and the policy framework (this was formerly within Defra's remit) and Ofgem is responsible for administering the programme.

This document sets out Ofgem's proposals for administering the amendments in the Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009, to be contained in the CERT 2008-2011. We are seeking comments on the issues described in this paper.

Associated Documents

- The DECC Amendment to the Carbon Emissions Reduction Target: full consultation proposals document - published February 09
<http://www.decc.gov.uk/en/content/cms/consultations/open/cert/cert.aspx>
- The DECC response to the Carbon Emissions Reduction Target consultation – published June 2009
<http://www.decc.gov.uk/en/content/cms/consultations/open/cert/cert.aspx>
- The existing Ofgem CERT Supplier Guidance document
<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngers/Pages/InfProMngers.aspx>
- The Ofgem CERT Technical Guidance document
<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngers/Pages/InfProMngers.aspx>

- The Ofgem CERT Market Transformation Action document
<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngers/Pages/InfProMngers.aspx>

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Summary

The Carbon Emissions Reduction Target (CERT) 2008 – 2011 follows on from the EEC 2005 – 2008 and requires gas and electricity suppliers that have at least 50,000 domestic customers to achieve targets for the reduction in carbon emissions generated by the domestic sector.

The Electricity and Gas (Carbon Emissions Reduction) Order 2008¹ (the current Order) provides the statutory basis for the CERT. The government has consulted on proposals to amend the CERT, set out in the Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009 (the amendment Order).

This document sets out the changes that the government has stated in the amendment Order, and how we intend to administer these. These changes include the following:

- 20 per cent increase in the scale of the CER target to 185 million lifetime tonnes of CO₂
- Inclusion of real time displays (RTDs) and home energy advice packages (HEAs) as qualifying actions, each with a score specified in the legislation
- Increase of the innovation ring fence to 10 per cent of a supplier's obligation (or 12 per cent where at least two per cent is achieved via microgeneration)
- Provision of an incentive for the promotion of DIY loft insulation and professional loft insulation top up, where the installation takes place in the period between the Prime Minister's announcement of 11 September 2008 and 31 July 2009
- Restrictions to the delivery of compact fluorescent lamp (CFL) schemes

There are a number of issues which Ofgem seeks to address in this consultation document. Firstly, the inclusion of the new measures of RTDs and HEAs in CERT requires Ofgem to provide clarification as to their nature and special consideration surrounding their provision. This is, in part, because these measures are new, but also because of the inherent behavioural nature of their associated carbon reductions.

Secondly, there are also issues to be addressed regarding the impact of CFL distribution in CERT and also the risks surrounding promotion of DIY loft insulation.

Finally, there are further clarifications to be made to the existing CERT supplier guidance. In particular, acceptable levels of loft insulation coverage and the new allowance regarding G-rated boiler replacement. These are presented along with a number of other clarifications in complex areas or where new issues have arisen since the original document was published.

¹ SI 2008/188

1. Introduction

Chapter Summary

This chapter summarises DECC's amendments to the CERT and includes an introduction to the proposed Community Energy Saving Programme (CESP) and its potential for interaction with CERT.

There are no specific questions relating to this chapter.

1.1. The Carbon Emissions Reduction Target (CERT) 2008 – 2011 follows on from the EEC 2005 – 2008 and requires gas and electricity suppliers to achieve targets for the reduction in carbon emissions generated by the domestic sector. For the purposes of this document, the programme itself will be referred to as the CERT and the target for carbon emissions reduction as the CER target. A supplier's own individual target will be referred to as its 'carbon obligation'.

1.2. The Electricity and Gas (Carbon Emissions Reduction) Order 2008¹ (the current Order) provides the statutory basis for the CERT. Following consultation, the government has amended the CERT, as set out in the Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009. 'The amendment Order' refers to the final version of this statutory instrument which DECC has laid before Parliament.

1.3. Within this document the terms 'reduction in carbon emissions', 'carbon savings' and 'carbon score' are used interchangeably to refer to the reduction in lifetime tonnes of CO₂ which can be attributed to a measure.

1.4. Ofgem - the Office of the Gas and Electricity Markets - is governed by an Authority, consisting of non-executive and executive members and a non-executive chair. The Authority determines strategy, sets policy priorities and takes decisions on a range of matters, including price controls and enforcement. Within this document, we will refer to both the Authority and to Ofgem in this context.

1.5. The current Order requires licensed gas and electricity suppliers, that have at least 50,000 domestic customers, (either individually or as part of a group of companies) to meet a carbon obligation. It also sets the broad framework for how this is to be achieved. The overall CER target has been set by the government, and the scale of this requirement is increased in the amendment Order.

1 SI 2008/188

1.6. The amendment Order provides the statutory basis for the Government's proposed changes to the CERT. These can be summarised as follows (though at all times the precise language of the amendment Order ought to be consulted in construing the amendment Order):

- The 20 per cent increase in the scale of the CER target to 185 million lifetime tonnes of CO₂
- The inclusion of real time displays (RTDs) and home energy advice packages (HEAs) as qualifying actions, each with a score specified in the legislation
- The increase of the innovation ring fence to 10 per cent of a supplier's obligation (or 12 per cent where at least two per cent is achieved via microgeneration)
- Provision of an incentive for the promotion of DIY loft insulation and professional loft insulation top up, where the installation takes place in the period between the Prime Minister's announcement of 11 September 2008 and 31 July 2009
- Restrictions to the delivery of compact fluorescent lamp (CFL) schemes

1.7. This document sets out Ofgem's proposals for administering the amendment Order. It also contains clarification of some of the areas in the existing CERT Supplier Guidance, for instance areas which have come to light since the CERT programme commenced.

Interaction with CESP

1.8. DECC have also recently consulted on the new Community Energy Saving Programme (CESP). As specified in the primary legislation, Ofgem are named as the administrators. CESP is intended to be an obligation on energy suppliers and electricity generators to deliver CO₂ savings in the domestic sector via a whole house, street by street approach. Incentives are incorporated into the programme structure to encourage this type of delivery. We will be publishing a consultation on the administration of the CESP later in the summer. We will carefully consider how to administer this programme alongside CERT to ensure that the administration of both programmes is efficient and effective.

Timetable

1.9. DECC laid the amendment Order before Parliament on 2 July 2009 and this is expected to come into force on 1 August 2009. Our decision document detailing how the CERT will then be administered will be published in late August.

1.10. Ofgem's consultation on the administration of this Order, details of which are contained in this document, will last for a shortened period of 4 weeks from the publication of this document in order to minimise this gap between the Order coming into force and this guidance being finalised.

2. Administration of the amendment Order

Chapter Summary

This chapter sets out the amendments to the CERT, and how Ofgem proposes to implement these changes.

Respondents are invited to comment on the following questions:

Question 1: What evidence should be provided by suppliers to satisfy Ofgem of the lifetime of the battery in an RTD under normal conditions of use?

Question 2: Are Ofgem's proposals to ensure that the required information is gathered from partner organisations distributing RTDs sufficient?

Question 3: Is the proposal for determining the Priority Group percentage for an RTD scheme sufficient?

Question 4: Respondents are invited to comment on the level of monitoring of RTDs, and whether the questions are appropriate.

Question 5: Are Ofgem's proposed requirements for the content of HEAs sufficient to maximise the likelihood of carbon savings being realised?

Question 6: Are the proposed requirements on obligated suppliers promoting HEAs sufficient to prevent mis-selling of energy efficiency and low carbon products.

Question 7: Respondents are invited to comment on the proposed level of monitoring of HEAs, and whether the proposed question themes are appropriate.

Question 8: Is our representation of domestic CFL penetration and the surrounding issues reasonable, and in particular are there any further issues we might have missed?

Question 9: Are the proposed CFL scheme restrictions suitable and sufficient to ensure carbon savings from this measure are maintained?

Question 10: Is the variety of bulbs proposed appropriate, and does this allow sufficient consumer choice to ensure the realisation of carbon dioxide savings?

Question 11: Are the proposed restrictions for multi-pack and multi-purchase CFLs set at the correct level to ensure savings are realised?

Question 12: Respondents are invited to comment on what constitutes a request for a giveaway CFL, and what does not constitute a request.

Question 13: Given the scale of the CER target, are the monitoring requirements currently in place appropriate and set at a sufficient level to ensure that energy suppliers are meeting the requirements of the Order?

Increased target

2.1. DECC have decided to increase the scale of the overall CER target to 185 million tonnes CO₂ (lifetime) as stated in article 4 (amendment of article 3) of the amendment Order. When the carbon obligations are revised, Ofgem will apportion this increased CER target amongst the obligated suppliers.

2.2. The Priority Group obligation will remain at 40 per cent minima. The target setting methodology used to apportion the total obligation between obligated suppliers remains unchanged, hence the individual suppliers' obligations will continue to be set as defined in chapter 2 of the current CERT Supplier Guidance. The requirement for suppliers to notify Ofgem of their customer numbers by the 14th February each year for the remainder of the CERT period remains.

Increased innovation ring fence

2.3. The amendment Order details an increase to the cap on innovation in paragraph 3 of article 5 (Amendment of article 9 (achievement of carbon emissions reduction obligations)) of the amendment Order. Ofgem will administer CERT in accordance with this, allowing each supplier to meet up to 10 per cent of its obligation through market transformation and / or demonstration action, or 12 per cent where at least 2 per cent is microgeneration. These will replace the caps in the current Order, of 6 per cent and 8 per cent respectively.

New measures

2.4. DECC have decided that real time displays (RTDs) and home energy advice packages (HEAs) be included in the CERT programme as qualifying actions. They have been given a score which is specified in the legislation. DECC have specified in the amendment Order that the definition of market transformation action - as set out in article 2 of the current Order - be changed to include the promotion of RTDs and HEAs. This means that these measures will be eligible for the 50 per cent market transformation action uplift, up to the ring fence discussed in paragraph 2.3. This is the only substantive change proposed to the definition of market transformation action.

Real Time Displays

Definition of RTDs

2.5. According to article 3 (Amendment of article 2 (interpretation)) of the amendment Order, a "real-time display" means a device which, together with a transmitter used in connection with it, provides information to a domestic energy user relating to—

- (a) that domestic energy user's electricity consumption; and

(b) the cost of that consumption,
and does so at the time the consumption occurs.

2.6. RTDs will only be eligible CERT measures where they have been requested by the consumer (article 7 (Amendment of article 12 (approval of actions by the Authority))).

RTD scores

2.7. The savings that Ofgem must award to RTDs are set out in paragraph 5 of article 9 (Amendment of article 19 (notification of actions and determination of reductions in carbon emissions)). The standard score for an RTD is 0.996 lifetime tonnes of carbon dioxide. This is the equivalent of a 3.5 per cent reduction in average household electricity use over a 15 year lifetime.

2.8. DECC have assumed that RTDs without long life batteries will have a shorter operational life time. Therefore, those RTDs with short life batteries must be awarded savings reduced by 50 per cent, making the standard score for an RTD with short life battery 0.498 lifetime tonnes of carbon dioxide. The amendment Order defines a "short-life battery" in article 3 (amendment of article 2) as *"a battery which is not expected to power ...a real-time display ...for more than [one] year under normal conditions of use."*

2.9. RTDs only provide information on electricity use and therefore are assumed only to lead to a reduction in electricity use, and not to a reduction in the use of other fuels.

2.10. As set out in the amendment Order, DECC have set a two per cent cap for RTD and HEA activity. Furthermore, the supplier can choose whether to account for RTD and HEA activity as a standard action, a market transformation action, or as a combination of both. If all supplier's HEA and RTD activity falls in the market transformation category, uplifts will effectively enable a supplier to meet three per cent of its obligation through these measures. Ofgem will administer the provision of RTDs in CERT according to these details.

Notification of RTD schemes

2.11. Suppliers must provide details of the manufacturer and the model when making an RTD scheme notification to Ofgem. We will only approve as eligible under CERT products which meet the definition of an RTD as set out in the amendment Order (see paragraph 2.5).

2.12. Suppliers will be required to demonstrate that the delivery route they have chosen will address the requirement for RTDs to be requested by the consumer. This could be through returning vouchers provided on leaflets or consumers calling an advertised hotline to request their RTD. Ofgem will need to be satisfied that the details of the delivery route are sufficient to demonstrate that the RTDs have been

requested. Delivery routes that we do not consider constitute a request include contacting householders via techniques such as 'cold calling' with an RTD offer.

2.13. RTDs are proposed to be eligible as both standard action and as market transformation action. Suppliers should indicate on their notification if they intend the promotion to be classified as market transformation action. RTDs promoted as market transformation action will be eligible for the 50 per cent market transformation incentive, up to the specified cap.

2.14. Suppliers wishing to promote RTDs must provide details of the method by which the unit is powered as part of their notification. RTD units and their transmitters can be powered by three different methods :

- (a) directly from the mains power supply;
- (b) by rechargeable battery where power is supplied through a specific docking unit supplied with the RTD; or
- (c) by disposable battery

2.15. If the RTD is of a type powered by disposable battery, the notification should include evidence for the lifetime of the battery provided, under normal conditions of use in the real time display being promoted. If this information is not provided then the supplier will only be able to claim savings associated with a short life battery (see paragraph 2.9).

2.16. **Question 1:** Respondents are invited to comment on what evidence should be provided by suppliers to satisfy Ofgem of the lifetime of the battery in an RTD under normal conditions of use.

2.17. Suppliers must confirm that all RTDs powered by disposable batteries will be supplied with batteries. This will allow Ofgem to be satisfied that they will be used with either the long or short life battery as notified and the appropriate score can be awarded.

2.18. Suppliers should also ensure that, as far as possible, RTDs supplied are appropriate for the user, and are practical and able to be used. For example, the size of both the display text and buttons should allow ease of use for elderly householders. Units that are installed by a supplier or an agent working on behalf of the supplier should be placed in a position that is readily accessible to the householder.

2.19. Suppliers must demonstrate that they will take steps to ensure that they deliver only one RTD per household (for example cross checking the recipients' addresses).

Partner organisations distributing RTDs

2.20. We propose that an RTD declaration, similar to the partner CFL declaration, should be used when a supplier is distributing RTDs via a third party. A representative of the partner organisation would be required to sign this to declare that:

1. All RTDs that the supplier has provided to the partner have been distributed
2. All RTDs were requested by the householders receiving them
3. Steps have been taken to ensure that no more than one has been provided to any address
4. That the appropriate batteries were provided with each RTD, being either short life or long life dependent on the details of the approved scheme
5. How the Priority Group percentage has been determined and that the correct definition and relevant benefits have been used for this purpose

2.21. Suppliers using RTD declarations must be satisfied that their project partners will address the requirement for RTDs to be requested by the consumer and that they are appropriate for the user, as discussed above. We expect any supplier accepting declarations as evidence of a third party's activity to satisfy themselves that the partner is in a position to make the declaration, i.e. that the partner has robust systems in place to support this declaration. Ofgem may request details of this process, for instance as part of the CERT audits.

2.22. **Question 2:** Respondents are invited to comment on whether Ofgem's proposals to ensure that the required information is gathered from partner organisations distributing RTDs are sufficient.

Promotion timescale for RTDs

2.23. Suppliers will be able to claim for RTD measures provided to consumers after 11 September 2008 (i.e. from 12 September 2008 onwards).

Priority Group evidence for RTDs

2.24. We propose that the Priority Group percentage of an RTD scheme should be determined in any of the standard ways detailed in paragraph 5.5 of the CERT Supplier Guidance. These are:

- a) Checking documents (benefits, credits and income, or date of birth) of all recipients in receipt of measures.
- b) Monitoring a sample of recipients (only where the action does not involve a visit to the consumer's home by the supplier or the supplier's project partner; it is acceptable to monitor a random sample of recipients, rather than each one).

c) RTD Partner declaration - this is signed by a representative of a partner organisation which has determined the Priority Group percentage through one of the following types of evidence:

- (i) Database, e.g. membership database for a charity where benefit information is collated
- (ii) Checking details of all recipients on receipt of measures
- (iii) Monitoring a statistically significant sample of recipients
- (iv) Other, which can be suggested by suppliers

2.25. **Question 3:** Respondents are invited to comment on whether the proposal for determining the Priority Group percentage for an RTD scheme is sufficient.

Utilisation and technical monitoring for RTDs

2.26. Ofgem in conjunction with DECC considers that five per cent monitoring should be carried out on RTDs to monitor usage patterns and resultant behavioural change in domestic electricity use. Ofgem would determine a set of questions which should be asked by suppliers during utilisation monitoring. This monitoring would seek to establish:

1. If a single, working and appropriate RTD was installed in the dwelling.
2. If the householder has altered their behaviour in any way, and if so in what way.
3. To what extent the RTD encouraged this alteration in behaviour.

2.27. The sample size monitored by the supplier should be statistically significant, at a confidence level of 95 per cent. The supplier guidance document would include a table detailing the minimum sample sizes required for a given number of domestic consumers in receipt of an RTD. This sample size would not exceed 5 per cent of the measures distributed, and would need to be calculated at the time of the supplier notification.

2.28. This monitoring might, for example, take the form of a short telephone survey. In line with technical monitoring of other eligible CERT measures such as loft insulation, this should be conducted by an independent agency.

2.29. **Question 4:** Respondents are invited to comment on the proposed level of monitoring of RTDs, whether the proposed question themes are appropriate, and any additional questions that would be useful to inform future policy considerations.

Home Energy Advice

Definition

2.30. The new Schedule A1 (which is to be inserted into the current Order pursuant to the amendment Order) sets out the definition of an HEA. An HEA should be provided that will enable the householder to achieve energy efficiency savings or energy savings:

A home energy advice package means –

- (a) a home energy survey;
- (b) home energy assistance which means information provided in person at the time of the home energy survey; and
- (c) a written report which
 - (i) contains, as appropriate, information provided during home energy assistance;
 - (ii) contains a list of applicable actions which will help the domestic energy user achieve energy savings;
 - (iii) contains the contact details for the Energy Saving Trust; and
 - (iv) is provided to the domestic energy user within three months of the home energy assessment or survey.

2.31. Home energy assistance means information provided in person by someone suitably qualified to a domestic energy user further to a home energy survey, and which deals with the matters set out below:

- (a) where programming or heating controls
 - (i) are installed, how these controls may be used more effectively to achieve energy savings; and
 - (ii) are not installed, whether they would be appropriate for the property
- (b) where a boiler is installed to provide heating or hot water
 - (i) an assessment as to whether that boiler is working efficiently;
 - (ii) how that boiler may be used more effectively to achieve energy savings; and
 - (iii) whether that boiler could be replaced by a more efficient model;
- (c) in respect of any electrical appliances or devices, how they may be used more effectively to achieve energy savings or energy efficiency savings;
- (d) how energy savings can be achieved in relation to general hot-water use especially that connected to the use of showers, baths and washing machines; and
- (e) such other information which an energy assessor reasonably believes may assist a domestic energy user to achieve energy savings or energy efficiency savings.

2.32. Further to this definition, DECC have advised that we should take the meaning of “an assesment as to whether [a boiler which provides heating or hot water for the property] is working efficiently” to mean advice based on a visual

inspection of that boiler only. This visual inspection should ascertain whether the boiler and/or hot water thermostat(s) are set at an appropriate temperature. It should also seek to ascertain whether any special features are set – for instance, a 'keep-warm' hot water feature that may be found on some combination boilers. This information should be used to advise on the potential energy savings appropriately.

The contents of a home energy advice package

2.33. As defined in schedule A1 of the amendment Order, there are broad areas of advice that must be covered during the provision of an HEA. To ensure that advice provided under the CERT meets the requirements of the amendment Order and is standardised as far as possible, Ofgem will expect to see evidence of the contents of the advice package before any such scheme is approved.

2.34. In order to set a robust framework for good advice, we have expanded on the legislation as set out in the recommendations below. DECC consider this in their response to the amendment CERT consultation "Ofgem can expand on this [the SI] in their Supplier Guidance, with a view to providing a detailed proforma outlining the behaviours and issues energy suppliers would be expected to cover when providing good advice, and advice which is specific to the circumstance of the householder."

2.35. Ofgem considers that a home energy survey consists of a visual inspection undertaken by an energy advisor with the householder present. The purpose of this survey is to establish the status of the fabric, insulation level, space heating, hot water, lighting and appliances of the dwelling. The home energy survey and consequent recommendations should be in line with current industry standards.

2.36. During home energy assistance, recommendations from the energy survey should be discussed with the householder. In addition to this, energy saving behaviours relevant to the householder should also be discussed. The topics covered and advice given should be in line with that provided by the government's Act On CO₂ campaign, the Act on CO₂ carbon calculator, and the Energy Saving Trust.

2.37. The carbon score attributed to HEAs is based on a reduction in gas and electricity use through energy saving behaviour. To maximise the likelihood of this carbon reduction being realised after an HEA has been provided, it is essential that sufficient time is dedicated to the energy behaviours portion of the assistance. Similar weighting should be given to the recommendations from the energy survey and advice on behaviours during the assistance, and suppliers will be expected to show how this will be achieved.

2.38. Individual energy saving behaviours vary widely in their impact on a home's carbon dioxide emissions and the domestic fuel bill; for example, carbon savings from turning a thermostat down by one degree are significantly higher than those from unplugging mobile phone chargers. To ensure that the carbon savings

attributed to HEAs are realised, the relative impact of different behaviours needs to be clearly communicated. Suppliers must therefore ensure that their energy assessors understand these relative impacts, and that these are contained in the assistance proforma and the resulting energy report.

2.39. The home energy report should cover the recommendations and behaviours discussed during the advice visit and contact details for the Energy Saving Trust clearly set out. These should be provided to the householder within a maximum of three months from the date of the advice visit.

2.40. Ofgem will want to see examples of the surveys, assistance proformas and energy reports in the scheme notification, along with evidence that these are in line with the scope and content of the industry standards outlined above. Suppliers must keep on record copies of the completed surveys, proformas and reports. These may be checked during auditing. Furthermore, DECC have indicated that they may wish to see an anonymised sample of these surveys, proformas and reports.

2.41. **Question 5:** Respondents are invited to comment as to whether Ofgem's requirements for the content of HEAs are sufficient to maximise the likelihood of carbon savings being realised.

Home energy assessors

2.42. In order to ensure that the energy advice provided under CERT is of a suitable quality, the advice must be provided by a qualified person. In article 3 (amendment of article 2 (interpretation)) of the amendment Order, this person is known as an 'energy assessor' and is defined as follows:

"energy assessor" means a person with any of the following qualifications—
(a) City and Guilds (6176) in Energy Awareness;
(b) Level 3 of the National Vocational Qualification 6049-03 (Provide Energy Efficiency Services);
(c) National Occupational Standard for Housing and Community Energy Advisers;
or
(d) a person with an equivalent qualification that is recognised by a member State of the European Union, an EEA State or by Turkey;

2.43. As provision of an HEA requires access to a dwelling, Ofgem require all energy suppliers to put in place appropriate checks to ensure that energy assessors are evidenced as being fit and proper persons to provide advice. When recruiting energy assessors, suppliers should comply with standard licence condition 13.1d¹

¹ Standard conditions of electricity supply licence, Ofgem consolidated 4th April 2009

with regards to recruitment of meter readers. This would include such steps as checking previous criminal convictions and obtaining independent character references.

Mis-selling of energy efficiency products during advice

2.44. We consider that householders are likely to view an energy assessor performing an HEA as an expert. As such, the opinion of the HEA is likely to be seen as trustworthy by the householder. Ofgem therefore want to ensure that energy assessors acting on behalf of an energy supplier are respectful of this dynamic and do not, intentionally or otherwise, misadvise consumers on the purchase of an energy efficiency or microgeneration installation, energy tariff or tariff switch. With consideration of i) the conduct of energy assessors and ii) the boundaries of energy assessors' expertise, we have set out below how we intend to address this issue.

2.45. With respect to conduct, conditions and guidance already in place for the sales and marketing of energy products should be followed in the same spirit in this different context of energy efficiency. There will be some elements of these which relate specifically to energy products and thus will not be applicable; common sense should be used.

2.46. Standard Licence Condition 25¹ deals with marketing energy to domestic customers, and related activity before, during and after an HEA visit should be in the spirit of this condition. Also, in our consultation on proposed retail market remedies² Ofgem proposed overarching standards to help consumers engage effectively in the energy market. These have been kept intentionally broad in order to capture the full range of supplier interactions with consumers. We expect energy suppliers to adhere to all relevant elements of both these guidance documents when providing details of their own energy efficiency offerings during the provision of a home energy advice package.

2.47. Also of relevance is the Energy Sure code of practice relating to the face-to-face marketing of energy supply³. We encourage suppliers to adhere to the relevant elements of this code when providing details of their own energy efficiency offerings during the provision of a home energy advice package.

2.48. Whilst there are qualifications specified in the amendment Order to ensure a basic quality of advice is provided, suppliers should consider the expertise of assessors. We expect that advice on the suitability of installation is only provided

¹ Standard conditions of electricity supply licence, Ofgem consolidated 4th April 2009

² Energy supply probe – proposed retail market remedies consultation, 15th April 2009
www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=97&refer=Markets/RetMkts/ensuppro

³ Code of practice for the face-to-face marketing of energy supply, EnergySure 2008
www.energy-retail.org.uk/documents/EnergySureCodeBookwebcopyhighres.pdf

by those suitably qualified. If the advisor is not suitably qualified to recommend a measure - for example, because a site survey for a microgeneration installation would be necessary - the householder should be referred to a suitably qualified person or organisation before direct sales or marketing activity is commenced.

2.49. **QUESTION 6:** Respondents are invited to comment on whether the proposed requirements on obligated suppliers are sufficient to prevent mis-selling of energy efficiency and low carbon products.

HEA scores

2.50. The savings that Ofgem must award to HEAs are set out in sub-paragraph 5 of article 9 (amendment of article 19 (notification of actions and determination of reductions in carbon emissions)). The standard score for an HEA is 0.675 lifetime tonnes of carbon dioxide.

2.51. As set out in the amendment Order, DECC have set a two per cent cap for RTD and HEA activity. The supplier can choose whether to account for RTD and HEA activity as a standard action, a market transformation action, or as a combination of both. If all a supplier's HEA and RTD activity falls in the market transformation category, uplifts will effectively enable a supplier to meet three per cent of its obligation through these measures. Ofgem will administer the provision of RTDs in CERT according to these details.

Notification of HEA schemes

2.52. The new Schedule A1, covered in detail above, sets out what a home energy advice package must include. As part of their notifications, suppliers must satisfy Ofgem how these requirements will be met, in order for Ofgem to be able to approve the scheme.

2.53. The promotion of HEAs is only eligible when requested by the consumer.

2.54. Furthermore, HEAs are proposed to be eligible as both standard action and as market transformation action. Suppliers should indicate on their notification if they intend the promotion to be classified as market transformation action. HEAs promoted as market transformation action will be eligible for the 50 per cent market transformation uplift.

2.55. Suppliers wishing to undertake an HEA scheme must provide the following details as part of their scheme notification to Ofgem:

1. Who will be carrying out the assessment, and what their qualifications are (general description of the group of people and the qualification and checks that they hold, either the company or individuals as appropriate)
2. What checks have been performed to ensure that assessors are fit and proper persons.

3. How suppliers intend to promote the in-home advice to consumers e.g. contacting their customer base, via partner organisations, etc
4. How the supplier will ensure that HEAs are only provided on request from a customer and what form this request will take
5. Evidence that the scope and content of HEAs are in line with industry standards
6. Evidence that the energy assistance will meet the requirements of the amendment Order
7. How the supplier will ensure that suitable reports have been delivered to the advice recipient within the specified timescale
8. How the supplier will ensure that only one HEA is provided per household - this should be address and name specific

2.56. We propose that points five and six could be achieved by providing a sample energy survey, energy assistance proforma (that will be used by an assessor during a home visit), along with a sample energy report, as part of the scheme notification. All records of energy assistance checklists and energy reports should also be kept for the purposes of auditing.

2.57. Suppliers wishing to promote HEAs will need to be able to demonstrate that their energy assessors conform to the qualification requirements as described in the amendment Order, and also that they are 'fit and proper persons' (see para 2.43). Ofgem may check this through the CERT audits.

2.58. We welcome views on this proposal and also alternative suggestions on how Ofgem could ensure that HEA reports provided by CERT obligated suppliers are meeting the requirements set out in the Order.

2.59. Ofgem will not be able to approve schemes unless they meet the requirements set out in the amendment Order.

Promotion timescale for HEAs

2.60. Suppliers will be able to claim for HEA packages promoted to consumers after 11 September 2008 (i.e. from the 12 September 2008 onwards). Ofgem considers that a HEA package is promoted when an advice visit is provided to a consumer, and subject to a clear auditable trail to report provision.

Priority Group evidence for HEAs

2.61. As an HEA will involve a visit to the consumer's home, we consider that the only appropriate way to monitor the Priority Group percentage is via checking documents, as for all other types of schemes involving a home visit (see paragraph 5.5, existing CERT Supplier Guidance).

Utilisation and technical monitoring for HEAs

2.62. As HEAs are a newly approved offering under the CERT, DECC have requested that Ofgem gather information relating to the impact and utilisation of these to ensure delivery of HEAs is effective. Further to this, Ofgem want to see evidence that HEAs are being carried out in line with the amendment Order and the supplier guidance. Ofgem will determine a set of questions which should be asked by suppliers during utilisation monitoring. This monitoring would seek to establish:

1. If the householder received an advice visit, and how long the assistance portion of this visit lasted.
2. If the householder has installed any energy efficiency or low carbon measures as a result of receiving the energy efficiency advice provided.
3. If the householder has altered their behaviour in any way, and if so in what way.
4. To what extent the advice received encouraged the householder to take up this purchase / change their behaviour.

2.63. We propose that the sample size monitored by the supplier should be statistically significant, at a confidence level of 95 per cent. The supplier guidance document would include a table detailing the minimum sample sizes required for a given number of domestic consumers in receipt of an RTD. This sample size would not exceed five per cent of the measures distributed, and would need to be calculated at the time of the supplier notification.

2.64. This monitoring might, for example, take the form of a short telephone survey, online questionnaire or feedback form. In line with technical monitoring of other eligible CERT measures such as loft insulation, this should be conducted by an independent agency.

2.65. **Question 7:** Respondents are invited to comment on the proposed level of monitoring of HEAs, and whether the proposed question themes are appropriate.

Loft insulation incentive

2.66. A new incentive was proposed in DECC's consultation for DIY loft insulation and loft insulation top up. Article 3 of the amendment Order details this :

"loft insulation plus" means—

- (a) the provision to a domestic energy user of loft insulation which adds to existing loft insulation which is at least 60mm in depth and where that additional insulation is installed by a person with appropriate experience or qualifications; or
- (b) the promotion of loft insulation through a retail outlet.

2.67. The amendment Order states that these proposals only apply between 11 September 2008 and 31 July 2009. **After this period no additional uplifts or incentives will apply to loft insulation.**

2.68. Article 9 of the amendment Order inserts a new paragraph (3A) into article 19. The new subparagraph (3A)(a)(ii) details the 100 per cent uplift for professionally installed loft insulation in the Priority Group and a 50 per cent uplift for professionally installed loft insulation and also for DIY loft insulation. This is the uplift that will apply for the period between 11 September 2008 and 31 July 2009.

2.69. Ofgem will accredit provision of loft insulation in the CERT according to these details.

DIY loft insulation

2.70. As outlined above, DECC proposed additional incentives or 'uplifts' for DIY loft insulation. These uplifts are applicable to measures promoted between 11 September and 31 July 2009 (see para 2.68).

2.71. The possibility of double counting of DIY loft insulation with professionally installed loft insulation was exacerbated by the incentive. If loft insulation which has already been subsidised for retail to the DIY market were to be bought by professional installers, it would then very likely be installed professionally under another CERT scheme, thus being counted twice. To mitigate this risk Ofgem, obligated suppliers, DECC and insulation manufacturers worked together to agree some best practice guidelines, which all obligated suppliers signed up to. The detailed guidelines have been published on the Ofgem CERT website at <http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngrs/Pages/InfProMngrs.aspx>.

2.72. Whilst the uplifts are not being taken forward, the potential for double counting between retail and professionally installed loft insulation schemes still exists. As such, DECC and Ofgem consider that these guidelines should remain in place for all suppliers promoting loft insulation schemes.

Ofgem intends to reinforce these guidelines by adding to its guidance requirements for suppliers to -

- Ensure that their professional installers are aware that loft insulation sold for DIY use should not be used for professional installations. For example, this might be through the means of a regular reminder letter to a supplier's installer network.
- Ensure that retail staff at retail outlets participating in DIY loft promotions under the CERT are adequately trained, including appropriate refresher training as necessary.
- Set a maximum amount of 100m² of DIY loft insulation material that can be bought at participating retail outlets at any one time by any one person.

- Ensure the marking of DIY loft packaging and marketing material, along with the marking of the material itself 'for DIY use only' or dyed a specific colour.

2.73. Suppliers must demonstrate in their notification to Ofgem how they intend to put these guidelines into practice.

2.74. In addition, we will monitor this activity through the inclusion of an additional technical monitoring question for professional loft insulation as follows:

- Was the insulation marked 'for DIY use only' or dyed a specific colour?

2.75. Any instances where material marked for DIY use only is found to have been installed professionally will be investigated thoroughly and appropriate action taken.

CFLs

2.76. Large quantities of compact fluorescent lamps (CFLs) are now in circulation. In addition to those delivered during previous obligation periods such as the EEC, over 150 million were delivered during the first year of CERT alone. As a consequence of this, the amendment Order sets out changes to the promotion of CFLs under the CERT from 1 January 2010.

2.77. Ofgem intends to apply further restrictions to these changes, which are endorsed by DECC as detailed in their consultation response document¹. However, in order that a sufficient - albeit shortened - consultation period is given to this document, there will be a short delay between the amendment Order coming into force and this supplier guidance being published by Ofgem. Therefore, Ofgem will apply these restrictions only from the date this amended supplier guidance document is published.

2.78. These amendments and restrictions outlined above are detailed below, as are Ofgem's proposals for the administration of these.

Background

2.79. There are a variety of delivery routes that suppliers currently use in promoting CFLs, including:

- 1.** Retail – subsidised products sold via retail outlets
-

¹ Government Response to Carbon Emissions Reduction Target (CERT) Consultation <http://decc.gov.uk/en/content/cms/consultations/open/cert/cert.aspx>

2. Direct, which includes:
- a. Promotions/give-aways – via newspapers/Bingo Halls/supermarkets
 - b. Mail-outs – via social housing provider/charity etc.
 - c. Mail-outs – to own customer base

2.80. Direct mail-outs have by far been the most popular method of delivering CFLs under CERT and cause the most concern because many are unsolicited.

2.81. Some suppliers also form partnerships with Housing Associations, Local Authorities etc. and mail out CFLs unsolicited via this route. This has had the effect of some households receiving more than one pack of bulbs e.g. one from their energy supplier and one from their Local Authority.

2.82. Along with retail partnerships, these promotion routes have led to around 150 million CFLs being delivered in the first year of CERT alone. In combination with the volume distributed within EEC2, this makes a total of 250 million bulbs – an average of around 10 per household.

2.83. Ofgem has a duty to ensure that savings from the programmes it administers are realised; the very high volumes of CFLs already distributed leads Ofgem and DECC to question whether the full savings attributed to CFLs have been realised, and if continued distribution will lead to further carbon savings in the UK domestic sector. Primarily, our concern is that these bulbs have not all been installed, and that those installed are not being used in the higher use fittings upon which the carbon score is based. This concern is shared by DECC, as discussed in paragraph 83 of their consultation response: "...there is an increasing risk to carbon savings under the scheme where lamps are not used, are installed on low use light fittings, or replace existing CFLs."

2.84. Furthermore, there are a wide variety of different CFLs that are eligible under CERT. These bulbs accommodate differences in light fittings, light switch types, designs, and the technical lighting performance of the bulbs. If a householder/consumer does not have sufficient opportunity to exercise choice in the lamp that they receive, there is an additional risk that the lamp will not realise the predicted lifetime carbon dioxide savings - either because it is not installed, or because it is removed at a later date. This risk is present with all CFL schemes, but Ofgem consider it particularly so when lamps are received via promotions / giveaways, mail-outs, and retail multi-pack / multi-purchase offers.

2.85. **Question 8:** Ofgem invites respondents to comment on whether our representation of domestic CFL penetration and the surrounding issues is reasonable, and in particular if there are any further issues we might have missed.

Amendments and Recommendations

2.86. The amendment Order introduces restrictions to CFL schemes as follows in new paragraph (7C) of article 12:

"The Authority must not on or after 1st January 2010 approve as a qualifying action the provision of compact fluorescent lamps except where a supplier seeks to promote the purchase of compact fluorescent lamps through a retail outlet."

Ofgem will administer the provision of CFLs within CERT in accordance with this legislation, and **beyond 1 January 2010 only retail lamps will be a permissible action. All other promotions under CERT must cease.** Ofgem's definition of the purchase of a CFL via a retail outlet is defined below (see para 2.77).

2.87. Before this comes into force, Ofgem must ensure that it has reasonable confidence that the CFLs provided during this interim period (from the date the amendment Order comes into force until 31 December 2009) realise their ascribed carbon savings. As such, we have a number of recommendations relating to this period.

2.88. Firstly, Ofgem will require that all CFL schemes offer a variety of bulbs to consumers, allowing them sufficient opportunity to exercise choice in the lamp that they receive. This requirement is endorsed by DECC, as expressed in paragraph 85 of their response to the CERT consultation where they state "We believe that respecting consumer choice in the range of bulbs promoted will be critical if installation and carbon savings from CFLs are to be maximised."

2.89. Secondly, during the interim period Ofgem will limit unrequested customer base direct mailouts to those suppliers who have not yet done so. We will then restrict any further direct promotion and giveaways of CFLs to those requested by consumers, and further restrict retail offerings to ensure that promotions are such as to ensure Ofgem's confidence that bulbs will be installed and carbon savings realised.

2.90. Ofgem will administer provision of CFLs within the CERT in accordance with the legislation, and intends to do so in line with the recommendations summarised above. The detail of this administration is set out in the proposals below.

2.91. **Question 9:** Ofgem invites respondents to comment on whether the proposed CFL scheme restrictions are suitable and sufficient to ensure carbon savings from this measure are maintained.

Proposals (for Administering CFL Schemes)

2.92. We have carefully considered the various delivery mechanisms that the suppliers use in promoting CFLs, and the variety of CFLs that should be promoted. We intend to adopt the **following amended guidance for all CFL schemes from the day this amended supplier guidance is published.**

2.93. Suppliers will be required to submit evidence to Ofgem covering how they will implement these changes.

2.94. Suppliers should report all non-retail schemes (producing a completion report for the scheme) to Ofgem by 1 April 2010.

Choice of CFL

2.95. Ofgem propose that **all** CFL schemes be required to offer a choice of a variety of bulbs. This is to ensure that the consumer can choose a lamp that will be acceptable to them. We think this is reasonable in order to ensure that the lamp is likely to be installed and maintained, thus realising predicted lifetime carbon dioxide savings.

2.96. This applies in particular to multi-purchase / multi-pack retail schemes, and for schemes which provide CFLs on request via direct promotions and giveaways.

2.97. As discussed in paragraph 2.84, there are a number of different elements that contribute to the variety of CFLs on offer. Ofgem believe that a reasonable choice in variety of bulbs would be provided by the following:

1. Fitting types: consumers should be able to choose a bulb which is appropriate to the light fittings in their home. A choice of bayonet, standard and narrow Edison screw should be available to them. In multi-packs, this is likely to mean a choice of multi-packs with a single fitting type in each.
2. Light output: consumers should be able to choose a bulb which gives a light output equivalent to that of the bulb they are replacing. A choice of lamps ranging from 25W to 100W replacements should be available.
3. Lamp design: consumers should be able to choose a bulb which is of an acceptable aesthetic and size to them. A choice should include spiral, mini stick and frosted GLS look-a-like bulbs.

2.98. Ofgem will require evidence of how the supplier will provide this choice.

2.99. **Question 10:** Ofgem invites respondents to comment on whether the variety of bulbs proposed is appropriate, and whether this allows sufficient consumer choice to ensure the realisation of carbon dioxide savings.

Retail delivery route

2.100. Ofgem will administer the CERT according to the amendment Order, as set out above. Ofgem consider that if consumers actually purchase CFLs then they are highly likely to be used. Ofgem take the definition of purchase to be the act of "obtaining goods in exchange for money".

2.101. Ofgem need to be able to distinguish between the purchase of CFLs through a retail outlet, and offers where the price is so low as to constitute a virtual give-away. Further to this, we must ensure that any CFL qualifying action will be promoted for achieving improvements in energy efficiency. In assessing that a qualifying action has met these criteria, Ofgem will take into consideration the price

at which the light bulb is sold to ensure that proper savings have been made in accordance with the CERT programme.

2.102. Whilst multi-purchase / multi-pack CFL offers appear to give the consumer good value, the cost of a multi-purchase / multi-pack can be such that it may cause the consumer to purchase more bulbs than they are likely to install. In addition, where the cost of a multipack is lower than the cost of a single bulb, there is a risk that bulbs will not be installed and carbon dioxide savings not realised. Ofgem therefore proposes the following:

- a) multi-packs and multi-purchases of CFLs should be restricted in their size and volume to a maximum of three bulbs; and
- (b) multi-packs and multi-purchases of CFLs should contain a sufficient variety of bulb to satisfy Ofgem that an appropriate level of choice (as outlined in paragraph 2.93) is offered.

2.103. **Question 11:** Ofgem invites respondents to comment on whether the proposed restrictions for multi-pack and multi-purchase CFLs are set at the correct level to ensure savings are realised.

Direct promotions/give-aways

2.104. DECC have removed direct promotions and giveaways from CERT from 1 January 2010. These schemes will not be allowed to continue past this date, and Ofgem will administer the provision of CFLs within CERT according to these details.

2.105. In the interim period, the promotion of CFLs via free give-aways (with newspapers/ at bingo etc.) will be limited to those requested by a consumer with an appropriate level of choice being offered (see para 2.97). It is our view that a bulb has been received on request if the contact to obtain the bulb has been instigated by the consumer. For example, a consumer response to a marketing promotion in a newspaper by returning a voucher or calling a hotline number would be considered a request.

2.106. **Question 12:** Respondents are invited to comment on what constitutes a request for a free CFL, and what does not constitute a request.

Direct mail-outs

2.107. DECC have removed these from CERT from 1 January 2010. These schemes will not be allowed to continue past this date, and Ofgem will administer the provision of CFLs within CERT according to these details.

2.108. Ofgem believes that suppliers who have *not* delivered CFLs to their customer base should have the opportunity to do so, but that this type of scheme should be limited to one per supplier. This would mean every household in GB would be likely

to receive some CFLs and would allow the retail and promotions / give-aways to supplement them should householders require more.

2.109. Any supplier who has not yet delivered a CFL direct mail-out scheme to their customer base will be permitted to do so, so long as the promotion is finished before the cut-off date of 31 December 2009.

Priority Group qualifying benefits

2.110. The amendment of schedule 2 proposes to add the following to the list of qualifying benefits for the Priority Group:

"an income-related employment and support allowance under the Welfare Reform Act 2007."

2.111. An amendment to the threshold for household income for those on qualifying benefits and tax credits is specified in the amendment Order as £16,040, revised from £15,592.

2.112. Ofgem will administer the programme accordingly, accepting evidence of receipt of this benefit as evidence of Priority Group eligibility from the day after the amendment Order is brought into force. Amended declarations will be published in the final published CERT amended supplier guidance document. Where a declaration is submitted containing the updated list of benefits, this can only be used to declare the Priority Group percentage for measures delivered after the date that the new amendment Order is brought into force.

Interaction with CESP

2.113. There will be the potential for overlap between the Community Energy Saving Programme (CESP) and CERT as suppliers will be able to promote some of the same measures through both programmes. Ofgem will consider how to minimise any potential for double counting between the programmes when setting up the administration of CESP and developing the tools for suppliers and generators to use. For example, as CESP will include incentives for area based delivery and whole house approach, the CESP database will need to capture data house by house. This is not currently done under CERT but it might be necessary to consider in the future to help prevent double counting. Other avenues considered will be the use of the Energy Saving Trust's Homes Energy Efficiency Database (HEED) to carry out an automated check. These issues will be presented and discussed further in the upcoming CESP guidance consultation.

Monitoring

2.114. Ofgem has specific monitoring requirements of the CERT obligated energy suppliers. These set out that suppliers must monitor particular aspects of the

qualifying actions which they promote under the current Order, in order to ensure that they are meeting Ofgem's requirements and the requirements of the Order. These are detailed in the current version of Ofgem's supplier guidance document¹. Further to these, Ofgem has proposed a number of additional monitoring requirements in line with the additional elements set out in the CERT amendment Order.

2.115. CERT is the third phase of the household energy supplier obligation, which started with the energy efficiency commitment in 2002. Each phase has seen a significant increase in the supplier's obligation, along with the estimated cost of meeting the obligation to suppliers. Furthermore, the amendment Order has set out an increase to the overall CER target of 20 per cent to 185 lifetime MtCO₂.

2.116. **Question 13:** Given the scale of the CER target, Ofgem invites respondents to comment on whether the monitoring requirements currently in place are appropriate and set at a sufficient level to ensure that energy suppliers are meeting the requirements of the Order.

▪ ¹ The existing Ofgem CERT Supplier Guidance document
<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMnqrs/Pages/InfProMnqrs.aspx>

3. Clarification to existing guidance

Chapter summary

This section is to provide further clarification on areas of the existing CERT Supplier Guidance. These do not relate to DECC's proposals in the amendment Order, but are to provide clarification on areas of complexity or issues which have arisen since the existing CERT Supplier Guidance was published in January 2008.

Question 1: Are the proposed additional questions for professionally installed loft insulation - to ensure that where the whole loft could not be insulated there is a good reason for this - appropriate?

3.1. Paragraph 1.7 to our Technical Guidance outlines that we expect the whole loft to be insulated but that where there is "good reason", and as long as at least 2/3 of the areas has been insulated, we will award full savings – anything less than 2/3 and savings awarded would be reduced accordingly as follows:

Full Savings Score x (loft area insulated / total loft area) = Savings Score awarded

3.2. We have been asked to provide clarity on what constitutes a "good reason". This should be based on common sense. For example we understand that there may be unmoveable obstructions in the loft (such as water tanks) – these would count as "good reason". We are also aware that in some instances the customer would like part of their loft to remain boarded (for storage etc.) – in these instances we would expect the installer to attempt to persuade the customer to have the whole loft insulated. However, if the customer still refuses then we would expect the installer to attempt to at least partially insulate under these boarded areas by pushing the insulation underneath where possible. The key elements that we would look at are whether:

- a real attempt has been made to insulate the whole loft,
- there are specific reasons why the whole loft cannot be insulated,
- the un-insulated area is less than 1/3 of the total loft area.

3.3. We propose to add the following questions to the standard technical monitoring questions for professional loft insulation:

Where the whole loft has not been insulated:

1. Has 2/3 or more of the total loft area been insulated?
 - a. If not, approximately what proportion has been insulated?
2. Why was the whole loft not insulated (tick one):
 - a. Inaccessible due to immovable objects e.g. water tank

- b. In use for storage (customer would only take up offer of insulation if storage space could be maintained)
3. Have any areas been partially insulated e.g. insulation pushed under crawl boards? (If yes provide details).

3.4. We are obliged to ensure that those carbon savings that are claimed are actually realised (so as not to undermine the CERT programme) however we appreciate some of the practical difficulties sometimes encountered in practice.

G rated boilers

3.5. From 10 February 2009 the early replacement of operational G-rated boilers became an eligible measure under the CERT programme, subject to these measures being promoted in line with our Early Replacement of G rated Boilers guidance note, available from <http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngrs/Pages/InfProMngrs.aspx>

3.6. Carbon reductions are not awarded for general boiler replacements under the CERT as they are not additional to current Building Regulations requirements. The CERT programme does however accredit carbon reductions for the replacement of D-rated (Building Regulations 2000) exceptions if they are replaced with an A or B-rated boiler as in this case the difference between the B rated and D rated boilers is additional to the Building Regulations requirements (see paragraphs 3.63 and 3.64 to the Supplier Guidance).

3.7. Under the former EEC programmes (predecessor to CERT), and under CERT, boiler replacements have only been accredited when the old boiler has broken down and therefore needs to be replaced. There has never been a provision for the replacement of working boilers.

3.8. The early replacement of the most inefficient (G-rated) boilers (i.e. of boilers that are still working) within the existing housing stock has not been approved in the past as there was no clear way to independently assess that the boilers were G-rated and that they were working at the time of replacement. The advent of Energy Performance Certificates (EPCs) has changed this and EPCs now provide a clear route to 'independent verification'. Therefore, having assessed all the relevant information and conducted lengthy discussions with the industry, Ofgem has decided to allow the accreditation of carbon reductions associated with these early replacements of G-rated boilers under CERT.

Scores

3.9. Carbon reductions will be accredited based on the increase in efficiency from G (65 per cent) to A/B rated (market average, 88.3 per cent). The 65 per cent figure represents G-rated efficiency of 66 per cent minus 1 per cent to account for the poor controls that are likely to accompany an old boiler. The market average

efficiency is the same used by Defra (now DECC) for CER target setting purposes. These scores will be reduced by 10 per cent to account for the effect of secondary heating.

3.10. Based on the data that has been provided by the industry we have determined the average remaining lifetime of G-rated boilers to be 6 years.

Notification

3.11. Boilers for early replacement under CERT must therefore be:

- a) identified as G-rated; and
- b) confirmed as working via an independent assessor and EPC.

3.12. Only boiler replacements identified via this route will be eligible under the CERT programme. To assist EPC assessors a list of G-rated boilers (make and model) has been collated by industry. This is available on the Ofgem website (<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/InfProjMngrs/Pages/InfProMngrs.aspx>)

3.13. Replacement boilers must be installed in line with the technical, specific, and best practice guidelines requirements set out in paragraphs 2.6 to 2.9 to the CERT Technical Guidance.

3.14. Technical monitoring must be conducted on five per cent of installations, in line with paragraphs 8.24 to 8.28 to the existing Supplier Guidance.

3.15. Suppliers wishing to promote these boiler replacements should submit scheme proposals (or resubmissions of an existing heating scheme) to Ofgem in the usual way, providing sufficient detail in the pro forma to allow Ofgem to determine whether the proposed scheme meets these requirements.

3.16. It was agreed with suppliers that this requirement would be reviewed over the summer of 2009. This process will start this September.

4. Amendments to existing guidance text

Chapter summary

We are proposing to amend the following paragraphs of the existing CERT Supplier Guidance document to provide further clarity to the guidance document. Any text in italics is proposed to be added and text in square brackets is proposed to be deleted.

Paragraph 3.10 – domestic energy users and domestic premises

3.10 For an action to be counted towards a supplier's carbon obligation Ofgem must be satisfied that the action has been promoted to domestic energy users in Great Britain¹. *A domestic energy user is defined in the Order as 'a person who uses energy in domestic premises in Great Britain wholly or mainly for domestic purposes'. We consider that an action which is promoted to domestic premises will be promoted to a domestic energy user. Ofgem will consider domestic premises to be self contained, permanent dwellings, mainly for domestic purposes. For these reasons, accommodation such as university halls of residence or residential care homes will not be considered domestic premises. People living within Housing of Multiple Occupation² (HMOs) will be considered to be domestic customers where the HMO is their permanent³ residence and the property is used mainly for domestic purposes. For example, those in shared houses would be considered domestic customers but not those staying in temporary hostels. Measures to be installed in communal areas of, for example, flats, may be eligible depending on the individual circumstances. Ofgem will need to consider these on a case by case basis and suppliers will be required to demonstrate how these measures will be promoted to domestic energy users.*

Paragraph 3.58 - Fridgesavers

3.58 For 'fridgesaver' schemes the existing appliance must be removed from the domestic premises and destroyed to ensure it is not reused. To support this, evidence is needed that the old appliance was indeed removed from the dwelling and destroyed. For example, Ofgem may request copies of the contracts with, or letters from, the relevant project partners. A declaration from the consumer does not provide sufficient guarantee that the existing appliance has been, or will be, removed and destroyed. *The scoring protocol in appendix 3 must be used to determine the*

1 Article 9(1) of the Order

2 HMOs are considered to be a house which is occupied by persons who do not form a single household, for example a house or flat which is the main home of at least two unrelated persons, sharing a kitchen or bathroom.

3 Permanent should be read as including leased premises

eligibility of each appliance before removal (see 4.15-4.24 of the CERT Technical Guidance Manual).

Paragraph 3.95 - Microgeneration

3.95 Microgeneration will only be considered eligible under CERT if the installer is accredited under the MCS set up by BERR, or an equivalent scheme. *If for commercial reasons it is not possible for a supplier or their partners to use MCS accredited installers, it will be the responsibility of the supplier to propose an alternative solution which achieves the same objectives as the MCS. Ofgem will review these proposals on a case by case basis.*

Paragraph 5.5 Priority Group evidence

5.5 Suitable ways of determining the Priority Group percentage are:

- a) Checking *documents* [details] (benefits, credits and income, or date of birth) of all recipients in receipt of measures.
- b) Monitoring *a sample of* recipients (only where the action does not involve a visit to the consumer's home by the supplier or the supplier's project partner; it is acceptable to monitor a random sample of recipients, rather than each one).

Paragraph 5.26 Third party delivery (not SHP)

We propose to replace this paragraph with the following clarified text:

5.26 Where project partners, such as charities, are delivering measures on behalf of suppliers they may not need to survey recipients if they already have knowledge about whether they are in the Priority Group, for example if they have recently monitored their members. In this situation the project partner should produce a signed letter stating the proportion of recipients who are in the Priority Group and detailing how this information has been established. Where CFLs are provided (up to 31 December 2009) the CFL declaration must be used for this purpose (Appendix 8); the SHP declaration cannot be used for this purpose. This must set out which of the methods to establish that percentage have or will be used. The methods are described in paragraphs 5.13-5.18, and are summarised below:

- A database of consumers in receipt of one or more of the relevant benefits or of age;
- Checking details directly;
- Monitoring; or
- Other details must be provided

We expect any supplier accepting declarations as evidence of a third party's activity to satisfy themselves that the partner is in a position to make the declaration, i.e. that the partner has robust systems in place to support this declaration. Any

organisation that signs the CFL declaration must be able to provide on request a robust explanation for the process of determining the Priority Group percentage that it has declared. Ofgem may request to see this explanation via the audit process.

Paragraph 5.40 - PG flexibility

5.40 Under *the amendments proposed to article 2(3) (c)* a Priority Group flexibility action means the provision to a householder within paragraph (a) or (b) of the Priority Group –

- of ground source heat pumps in respect of a property which does not have a mains gas supply; or
- of solid wall insulation which lowers the U-value of the walls to 0.5W/m²K or less.

Paragraph 6.2 - Notification

6.2 Such notification must be made before or within one month of commencement of the action. *Notification is made under article 11.*

Paragraph 8.4 - Monitoring requirements

8.4 The monitoring requirements can be summarised as follows (Priority Group monitoring is covered separately in chapter 5):

- One per cent customer utilisation for electrical items (or as agreed with the supplier), DIY loft insulation and DIY radiator panels provided to householders for free. For CFLs this is capped at 1000 maximum. *The Ofgem standard questions from Appendix 5 must be used.*
- Five per cent technical monitoring for professionally installed insulation and heating measures. *The Ofgem standard questions from Appendix 4 must be used.*
- Technical monitoring is not required for microgeneration measures installed under the MCS.
- One per cent customer satisfaction monitoring for professionally installed insulation, heating measures and microgeneration measures. *Questions will be approved on a case by case basis.*
- *Five per cent utilisation monitoring of RTDs to monitor usage patterns. The Ofgem standard questions from Appendix 5 must be used.*
- *Five per cent utilisation monitoring of HEAs. The Ofgem standard questions from Appendix 5 must be used.*

It should be noted that should a supplier wish to demonstrate a Priority Group percentage for a CFL scheme by linking Priority Group monitoring with customer utilisation monitoring, the sample needs to be of the appropriate size in line with figure 1, chapter 5. If only 1,000 recipients are monitored, the appropriate Priority Group percentage will only be able to be claimed for up to 20,000 recipients.

This is summarised visually in the table in *Appendix 6* [~~Appendix 9~~].

Paragraph 8.6 - Technical monitoring

8.6 The technical monitoring questions are divided into major and minor failures. While we expect that minor failures will be addressed and minimised, a supplier will only fail an inspection for major failures *and only these should be included in the percentage reported to Ofgem*. These relate to safety, legal requirements or major impacts on savings.

Paragraph 8.8 - Re-inspection

8.8 We consider that it is appropriate to re-inspect all installations which fail on safety grounds *to ensure that the safety problems have been adequately rectified*. This monitoring is in addition to the standard monitoring rates. Types of failure are explained in *Appendix 4* [~~Appendix 7~~].

Paragraph 8.9 - Standard monitoring questions

8.9 To ensure consistency between suppliers and clarity of administration, suppliers or their project partners and contractors are required to use the standard technical monitoring questions provided in *Appendix 7* [~~Appendix 4~~].

Paragraph 8.16 - CFL monitoring

8.16 *For those suppliers promoting direct schemes until 31 December 2009, the reduction in carbon emissions that will result from the delivery of CFLs is dependent on them being installed by the consumer. Therefore suppliers should monitor a sample of recipients of 'direct' CFLs (those that are distributed direct to consumers, i.e. free and mail order) using the monitoring questions set out in Appendix 5* [~~Appendix 8~~]. *Suppliers will not be expected to reduce their scores; this information will inform DECC's evaluation of the impact of the CERT.*

Appendix 4 - Standard Technical Monitoring Questions

We propose to add the following to the standard technical monitoring questions for loft insulation:

1. Was the insulation marked 'for DIY use only' or dyed a specific colour?
 - Has two thirds or more of the total loft area been insulated?
 - a. If not, approximately what proportion has been insulated?
 - Why was the whole loft not insulated (tick one):
 - a. Inaccessible due to immovable objects e.g. water tank
 - b. In use for storage (customer would only take up offer of insulation if storage space could be maintained)
 - Have any areas been partially insulated e.g. insulation pushed under crawl boards (if yes provide details)?

The following amendment will be made to the standard technical monitoring questions for boilers and controls:

Failure to install a cylinder thermostat with a regular boiler will be classified as a major failure.

Appendix 5 - Standard Customer Utilisation Monitoring Questions

CFLs direct (for those suppliers with direct schemes still to promote before 31 December 2009).

These new monitoring questions should be in place by 1 September 2009

1. How many *free* CFLs have been received?
2. *Of these, were any broken?*
3. How many *of these free* CFLs have been installed?
4. How many *of these free* CFLs will be installed and used at a later date?
5. How many *of these free* CFLs will never be used?
6. How many CFLs [do] *did* you already have fitted within your house *before you received these free ones?*

RTDs - Questions to be defined along in order to establish:

1. *If a single, working and appropriate RTD was installed in the dwelling.*
2. *If the householder has altered their behaviour altered in any way, and if so in what way.*
3. *To what extent the RTD encouraged this alteration in behaviour.*

HEAs - Questions to be defined in order to establish:

1. *If the householder received an advice visit, and how long the assistance portion of this visit lasted.*
2. *If the householder has installed any energy efficiency or low carbon measures as a result of receiving the energy efficiency advice provided.*
3. *If the householder has altered their behaviour altered in any way, and if so in what way.*
4. *To what extent the advice received encouraged the householder to take up this purchase / change their behaviour.*

Appendix 12 – Microgeneration additionality declaration

Point 3 will be amended to reflect the requirement that the measures will be additional to the Building Regulations

The installation exceeds the requirements of the Building Regulations and the measures will not be used to demonstrate compliance with the Building Regulations¹; i.e. each dwelling would have met the requirements of the Building Regulations even if a) the supplier funding had not been provided, or b) the microgeneration measure had not been promoted.

¹ Building Regulations 2000 (as amended)

Appendices

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Appendix 1 - Consultation Response and Questions

1.1. Ofgem would like to hear the views of interested parties in relation to any of the issues set out in this document.

1.2. We would especially welcome responses to the specific questions which we have set out at the beginning of each chapter heading and which are replicated below.

1.3. Responses should be received by 13 August 2009 and should be sent to:

- Emily Batchelor
- Energy Efficiency Manager
- Environmental Programmes
- Ofgem
- 9 Millbank
- London
- SW1P 3GE

- Telephone number: 020 7901 7488
- Email: emily.batchelor@ofgem.gov.uk
- Fax: 020 7901 7387

1.4. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem shall respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.

1.5. Respondents who wish to have their responses remain confidential should clearly mark the document/s to that effect and include the reasons for confidentiality. It would be helpful if responses could be submitted both electronically and in writing. Respondents are asked to put any confidential material in the appendices to their responses.

1.6. Next steps: Having considered the responses to this consultation, Ofgem intends to publish an amended CERT Supplier Guidance document and summary of consultation responses, once the amendment Order comes into force. Any questions on this document should, in the first instance, be directed to:

- Emily Batchelor (details above)

CHAPTER: One

There are no specific questions relating to this chapter.

CHAPTER: Two**Respondents are invited to comment on the following questions:**

Question 1: What evidence should be provided by suppliers to satisfy Ofgem of the lifetime of the battery in an RTD under normal conditions of use?

Question 2: Are Ofgem's proposals to ensure that the required information is gathered from partner organisations distributing RTDs sufficient?

Question 3: Is the proposal for determining the Priority Group percentage for an RTD scheme sufficient?

Question 4: Respondents are invited to comment on the level of monitoring of RTDs, and whether the questions are appropriate.

Question 5: Are Ofgem's proposed requirements for the content of HEAs sufficient to maximise the likelihood of carbon savings being realised?

Question 6: Are the proposed requirements on obligated suppliers promoting HEAs sufficient to prevent mis-selling of energy efficiency and low carbon products.

Question 7: Respondents are invited to comment on the proposed level of monitoring of HEAs, and whether the proposed question themes are appropriate.

Question 8: Is our representation of domestic CFL penetration and the surrounding issues reasonable, and in particular are there any further issues we might have missed?

Question 9: Are the proposed CFL scheme restrictions suitable and sufficient to ensure carbon savings from this measure are maintained?

Question 10: Is the variety of bulbs proposed appropriate, and does this allow sufficient consumer choice to ensure the realisation of carbon dioxide savings?

Question 11: Are the proposed restrictions for multi-pack and multi-purchase CFLs set at the correct level to ensure savings are realised?

Question 12: Respondents are invited to comment on what constitutes a request for a giveaway CFL, and what does not constitute a request.

Question 13: Given the scale of the CER target, are the monitoring requirements currently in place appropriate and set at a sufficient level to ensure that energy suppliers are meeting the requirements of the Order?.

CHAPTER: Three

Question 1: Are the proposed additional questions for professionally installed loft insulation - to ensure that where the whole loft could not be insulated there is a good reason for this - appropriate?

Appendix 2 – RTD Partner Declaration

This declaration must be signed by all project partners distributing RTDs for free.

For the purposes of the declaration, the following applies (all fields MUST be completed):

Organisation:
.....

Name of signatory, authorised to sign the declaration for and on behalf of the Organisation:
.....

Position in the Organisation:.....

Address:
.....
.....
.....

..... **Post Code**

Telephone number:

Fax number:

Email address:

Supplier:.....

Energy Saving Project: [enter the name of the project and a brief description]
.....

Energy Saving Project timescales

from:/...../..... **to**/...../.....

Priority Group Percentage:.....

Number of Real Time Displays (RTDs) delivered to, and distributed by, the Organisation ('the specified number of RTDs'):
.....

On behalf of the Organisation, I declare and confirm the following:

- 1) The Supplier has provided the Organisation with the specified number of RTDs which have all been distributed to domestic customers for the purpose of the Energy Saving Project.
- 2) All RTDs were requested by the householder receiving them.
- 3) All RTDs were provided with the batteries of the appropriate length and evidenced lifetime.

4) Steps have been taken by the Organisation to ensure that each household has received no more than one RTD.

5) All recipients of measures delivered under the Energy Saving Project counted in the Priority Group percentage fall within at least one of the following categories:

a) is in receipt of at least one of the following benefits:

Council tax benefit

Housing benefit

Income support

Income-based job seekers allowance

Attendance allowance

Disability living allowance

War disablement pension which includes either a mobility supplement or constant attendance allowance

Disablement pension which includes constant attendance allowance

State pension credit

an income-related employment and support allowance under the Welfare Reform Act 2007

or

b) is in receipt of at least one of the following credits:

Child tax credit where the relevant income is £16,040 or less

Working tax credit where the relevant income is £16,040 or less

or

c) is 70 years old or over

6) The supporting data sets have been cross checked with each other to ensure that no recipient has been counted more than once (anyone who is 70 or over and in receipt of the relevant benefits / credits should only be counted once).

7) The Specified Priority Group Percentage has been determined in the following way(s), tick as appropriate:

a) Partner's Database*

b) Monitoring a significant sample by post / telephone

c) Asked recipient directly

d) Other (please specify)

.....
 * A database is only permissible evidence when it contains the relevant benefit / credit / age information for determining Priority Group recipients, e.g. membership database for a partner organisation which checks this information. A database not containing the relevant information will not be considered evidence.

For all responses, further details must be provided if requested.

8) This declaration can be passed to Ofgem for the purposes of its assessment of whether 40 per cent of the total reduction in carbon emissions resulting from the supplier's actions have been made in relation to the Priority Group as required by the Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009.

Signed Date.....

Print Name.....

Appendix 3 – The Authority’s Powers and Duties

1.1. Ofgem is the Office of Gas and Electricity Markets which supports the Gas and Electricity Markets Authority (“the Authority”), the regulator of the gas and electricity industries in Great Britain. This Appendix summarises the primary powers and duties of the Authority. It is not comprehensive and is not a substitute to reference to the relevant legal instruments (including, but not limited to, those referred to below).

1.2. The Authority's powers and duties are largely provided for in statute, principally the Gas Act 1986, the Electricity Act 1989, the Utilities Act 2000, the Competition Act 1998, the Enterprise Act 2002, the Energy Act 2004 and the Energy Act 2008, as well as arising from directly effective European Community legislation. References to the Gas Act and the Electricity Act in this Appendix are to Part 1 of each of those Acts.

1.3. Duties and functions relating to gas are set out in the Gas Act and those relating to electricity are set out in the Electricity Act. This Appendix must be read accordingly¹³.

1.4. The Authority’s principal objective when carrying out certain of its functions under each of the Gas Act and the Electricity Act is to protect the interests of existing and future consumers, wherever appropriate by promoting effective competition between persons engaged in, or in commercial activities connected with, the shipping, transportation or supply of gas conveyed through pipes, and the generation, transmission, distribution or supply of electricity or the provision or use of electricity interconnectors.

1.5. The Authority must when carrying out those functions have regard to:

- the need to secure that, so far as it is economical to meet them, all reasonable demands in Great Britain for gas conveyed through pipes are met;
- the need to secure that all reasonable demands for electricity are met;
- the need to secure that licence holders are able to finance the activities which are the subject of obligations on them¹⁴;
- the need to contribute to the achievement of sustainable development; and
- the interests of individuals who are disabled or chronically sick, of pensionable age, with low incomes, or residing in rural areas.¹⁵

¹³ However, in exercising a function under the Electricity Act the Authority may have regard to the interests of consumers in relation to gas conveyed through pipes and vice versa in the case of it exercising a function under the Gas Act.

¹⁴ under the Gas Act and the Utilities Act, in the case of Gas Act functions, or the Electricity Act, the Utilities Act and certain parts of the Energy Act in the case of Electricity Act functions.

1.6. Subject to the above, the Authority is required to carry out the functions referred to in the manner which it considers is best calculated to:

- promote efficiency and economy on the part of those licensed¹⁶ under the relevant Act and the efficient use of gas conveyed through pipes and electricity conveyed by distribution systems or transmission systems;
- protect the public from dangers arising from the conveyance of gas through pipes or the use of gas conveyed through pipes and from the generation, transmission, distribution or supply of electricity; and
- secure a diverse and viable long-term energy supply.

1.7. In carrying out the functions referred to, the Authority must also have regard, to:

- the effect on the environment of activities connected with the conveyance of gas through pipes or with the generation, transmission, distribution or supply of electricity;
- the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed and any other principles that appear to it to represent the best regulatory practice; and
- certain statutory guidance about its contribution towards the attainment of any social or environmental policies issued by the Secretary of State.

1.8. The Authority has powers under the Competition Act to investigate suspected anti-competitive activity and take action for breaches of the prohibitions in the legislation in respect of the gas and electricity sectors in Great Britain and is a designated National Competition Authority under the EC Modernisation Regulation¹⁷ and therefore part of the European Competition Network. The Authority also has concurrent powers with the Office of Fair Trading in respect of market investigation references to the Competition Commission.

¹⁵ The Authority may have regard to other descriptions of consumers.

¹⁶ or persons authorised by exemptions to carry on any activity.

¹⁷ Council Regulation (EC) 1/2003

Appendix 4 - Glossary

Amendment Order

The draft Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2009.

Banking

The process of suppliers submitting interim activity reports and Ofgem estimating their savings before the end of the programme

Carbon obligation

Each supplier's carbon emissions reduction obligation

CERT

Carbon Emissions Reduction Target, the name of the programme.

CER target

The overall target for carbon emissions reduction set by the Government under the Order.

CESP

The Community Energy Saving Programme

CFLs

Compact Fluorescent Lamps (energy efficient light bulbs)

Current Order

The Electricity and Gas (Carbon Emissions Reduction) Order 2008. SI 2008/188

DECC

Department of Energy and Climate Change

Defra

Department for the Environment, Food and Rural Affairs

Delivery mechanism

See paragraph 3.5

EEC

Energy Efficiency Commitment, general reference to the EEC1 and EEC2 programmes which ran from 2002-2005 and 2005-2008, respectively

EEC2

Energy Efficiency Commitment 2005-2008

EPC

Energy performance certificate

HAs

Housing Associations

HEAs

Home energy advice package, see paragraphs 2.26-2.28

HMOs

Houses in multiple occupation

LAs

Local Authorities

Lifetime

The estimated lifetime for measures (as set out in Defra's illustrative mix)

MCS

Microgeneration Certification Scheme - an independent scheme that certifies microgeneration products and installers in accordance with consistent standards.

Priority Group

Defined in the Order in article 2

Priority Group flexibility action

See paragraph 5.40

RTDs

Real time display, see paragraph 2.6

Schemes

Suppliers' schemes for delivering their qualifying action

SHP

Social Housing Provider – a Local Authority or a Registered Social Landlord

Supplier

Defined in the Order in article 4(1)

Appendix 5 - Feedback Questionnaire

1.1. Ofgem considers that consultation is at the heart of good policy development. We are keen to consider any comments or complaints about the manner in which this consultation has been conducted. In any case we would be keen to get your answers to the following questions:

1. Do you have any comments about the overall process, which was adopted for this consultation?
2. Do you have any comments about the overall tone and content of the report?
3. Was the report easy to read and understand, could it have been better written?
4. To what extent did the report's conclusions provide a balanced view?
5. To what extent did the report make reasoned recommendations for improvement?
6. Please add any further comments?

1.2. Please send your comments to:

Andrew MacFaul

Consultation Co-ordinator

Ofgem

9 Millbank

London

SW1P 3GE

andrew.macfaul@ofgem.gov.uk