



# PILKINGTON

Mr. Charles Hargreaves,  
Head of Energy Efficiency,  
Ofgem,  
London.  
SW1P 3GE

Date 25 May 2005  
Reference 210/RRW/CH  
Direct Dial 01744 69 2914  
Fax 01744 69 2444

Dear Mr. Hargreaves,

## **Energy Efficiency Commitment 2005-2008; Innovative Action**

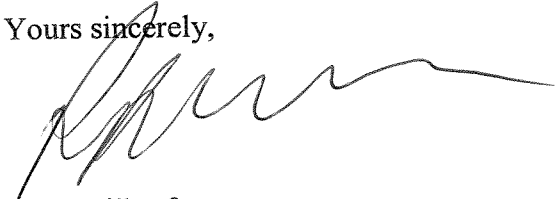
I am writing in response to your Consultation Document of April 2005, on behalf of ten trade associations connected with the fenestration industry\*. I chair a forum of this group, which was established at the request of ODPM to provide it with technical advice on the development of Building Regulations Part L and other related policy and legislative issues. The group wishes to make the following brief comments on the subject of EEC Innovative Actions:

1. As background, we welcomed the inclusion of windows in the list of Illustrative Measures published by Defra in November 2004. This was made possible by the development of a scheme for assessing the energy performance of windows (the British Fenestration Rating Council's Window Energy Rating scheme), which had been launched earlier in the year. Windows are now able to be rated and labelled on an A to G scale, similar to that for domestic white goods. The list of Illustrative Measures included windows rated in BFRC band C or above.
2. In your Consultation Document, it is clear that an energy saving measure which was not a qualifying action within EEC 2002-2005 will be regarded as an Innovative Action (see paragraphs 2.1 (i) (aa), 3.2 and 5.3). This is the case with energy efficient windows, and we therefore propose they be regarded as such.
3. Paragraph 5.6 adds that such a measure will be regarded as an Innovative Action if it "achieves an improvement in energy efficiency compared to the energy consumption of the product of that type complying with an applicable legal minimum standard". In the forthcoming amendments to Building Regulations Part L, due to be published in July 2005, there will be a legal requirement for replacement windows to achieve at least BFRC band E. The energy balance of a window in the middle of the band E range is  $-40 \text{ kWh/m}^2/\text{year}$ ; the comparable figure for a window in the middle of band C is  $-15 \text{ kWh/m}^2/\text{year}$ . Therefore a band C window achieves a substantial improvement over the forthcoming legal minimum and industry norm.

Pilkington plc

4. In light of the above, it appears to us that windows rated BFRC band C and better conform fully to the definitions and requirements of “Innovative Action”, and therefore any gas or electricity supplier supporting the installation of such windows should be entitled to increase by 50% the carbon savings credited to this measure. We look forward to your issuing this formal recognition.

Yours sincerely,



Rick Wilberforce  
Market Development Manager - Europe

- \* on behalf of The Glass and Glazing Federation, The British Plastics Federation Windows Group, The Council for Aluminium in Building, The Steel Windows Association, The British Woodworking Federation, The Flat Glass Manufacturers Association, The British Fenestration Rating Council, The Federation of Environmental Trade Associations, The Conservatory Manufacturers Association, The Door and Shutter Manufacturers Association