

Dear Mr Hargreaves

I would appreciate your advice as to what would be required for under floor heating to qualify as an innovative energy efficient action, under the Electricity and Gas (Energy Efficiency Obligations) Order 2004.

I am working on behalf of Warmfloor Ltd, who are committed to extending the benefits of under floor heating (UFH) to all, particularly those in need of affordable warmth. UFH systems can offer savings in energy costs from 30-50% compared to radiator systems, providing considerable potential to contribute to affordable warmth for people on low incomes. Moreover, the high circulating water temperatures needed by radiators require burning fossil fuels to generate the heat needed and their widespread use in domestic space heating presents a considerable barrier to reduction of carbon emissions from domestic homes. Whereas, the lower circulating temperatures used by UFH make this technology ideally suited to low/zero carbon energy generation systems, as they are low grade heat sources. However, despite these advantages, UFH currently represents only 2.5% of the heating market in the UK.

Recognition of Ground Source Heat Pump technology in the previous Order 2001 created the incentive for Powergen to offer discounted ground source heat pumps, through their Powergen HeatPlant package, which is starting to increase market penetration for this technology in the social housing sector. This suggests that if UFH qualified as an innovative energy efficient action, under the Order 2004, this would create the incentive for energy suppliers to discount the installation of UFH systems and thus boost market penetration for this technology. For example, as UFH is the optimum heat distribution system for ground source heat pumps, accreditation of UFH under the Order 2004, may create the incentive for Powergen to include UFH in their HeatPlant package, which will increase take-up of high efficiency, low carbon heating systems in the social housing sector where the majority of tenants are in the priority group specified in the Order.

Many thanks for your co-operation in this matter,

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