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Re: Consultation Response REF; 198/07 – Carbon Emissions Reduction Target (CERT)

Emily

Please find attached npower's response to the above consultation.

1. Qualifying Action

1.1 Microgeneration

npower support the development of the UKMCS as a single, industry-wide microgeneration accreditation scheme. When the scheme is fully operational then it will provide excellent way of ensuring the necessary quality of products and installations under CERT. However the UKMCS is not fully developed and we have several concerns about its current state, namely:

- A) **Cost of accreditation.** At present the proposed fees of the scheme are deemed too high. This may deter many installers and manufacturers from applying for accreditation therefore significantly reducing the potential for CERT grants to be given
- B) **Timeline for Approval** of both of products and installers. At present there is no guideline as to how long this process will take. We have to assume that there is a risk that no products or installers will be accredited in time for the start of CERT. Clarification is also required as to the required length of certification. Will it be for the entire duration of CERT or will it be necessary to renew throughout the programme?
- C) **New Technology** – There are no clear guidelines about the introduction of new products. We have to expect that new technologies

will be developed over the lifetime of the scheme that may also be appropriate for consideration for CERT grant status. This will not be possible if the product cannot gain accreditation.

Given that the UKMCS may not be fully developed in time for the start of CERT it would be prudent to have an interim measure in place. npower proposes that using the product and installer list which exists for the LCBP will provide sufficient guarantee of quality to be used for CERT until the UKMCS is fully launched. For clarity this interim measure could be limited to a specified period of time, i.e. six months from the start of CERT.

1.2 Measures Appliances

To reflect changes in the cold appliance market we feel approval of A+ and A++ appliances would be our favoured option; maintaining the methodology used in previous EEC programmes.

1.2.1 Market Transformation Uplift

Please provide clarity on A+ and A++ appliances eligible for market transformation uplift.

1.3 Reporting Option

A shorter report with summary of results and conclusions is our preferred choice to protect intellectual property; a longer report with the detailed data to be used for npower internal use.

2. Priority Group Flexibility Option

The rules around this process need to be clear and concise, enabling a transparent understanding. Ambiguity currently surrounds terminology of the process within CERT and choice of fuel measures.

3. Reporting and Monitoring

3.1 Scheme Monitoring

This should be appropriate with scheme type. Monitoring requirements are deemed onerous for smaller schemes. An example of this would be CFL schemes as per the consultation document.

3.2 Quarterly Reporting

This process is also arduous, and will hopefully be addressed by Ofgem at the supplier sub-group meeting in October 2007.

4. Ofgem Resource

npower is concerned with the limited resource available from Ofgem, particularly in relation to the proposed innovation schemes potentially starting in first half of CERT. npower believes that the resource should be sufficient to meet the demands of the six suppliers and reviewed as appropriate.

Kind regards

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npower

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