

RWE npower



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13th August 2009

Dear Emily,

■ **CERT Supplier Guidance Amendments**

Please find attached RWE npower's response to the questions raised in the above consultation.

I trust that this is helpful.

Yours sincerely,

Paul Tonkinson
Economic Regulation

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Appendix to RWE npower's response to Ofgem's CERT Supplier Guidance Amendments consultation

RTD's

Please note that we are concerned that there is a two per cent cap for RTD and HEA activity when the government want to encourage behavioural measures.

- Q1. We believe that independent manufacturer test results should provide sufficient evidence to satisfy Ofgem of the lifetime of the battery in an RTD.
- Q2. We believe that the RTD declaration will provide the required information from partner organisations distributing RTDs.
- Q3. We believe that the Standard Priority group checks and relevant proof is sufficient evidence for determining the priority group for RTD schemes.
- Q4. We feel that the five per cent utilisation monitoring requirement is set too high and should be kept in line with the current one per cent for standard consumer utilisation monitoring questions.

HEA

- Q5. We believe the contents of a home energy advice package to be sufficient information to maximise the likelihood of carbon savings being realised.
- Q6. We believe the proposed requirements are sufficient to ensure quality advice is provided and to prevent mis-selling of energy efficiency and low carbon products.
- Q7. We believe that the proposed question themes are appropriate and the level of monitoring will be adequate evidence that HEAs are being carried out in line with the requirements.

CFLs (Qs 8 – 12)

Given the ongoing debate and the fast moving nature of this issue since this consultation was published, we will continue to feed in our views via the various meetings and tele-conferences that have been set up rather than in detail here. We are also raising our concerns on this point with DECC.

In general, we are concerned about the proposed changes to CFL's and the potential for creating a competitive disadvantage to energy suppliers who have not yet utilised this measure widely within their programmes. A change to supplier guidance part way through a programme is unprecedented and will impact on energy suppliers relative costs of CERT delivery unless a reasonable notice period is allowed. We believe the notice period to the end of 2009 is reasonable provided this does represent a genuine notice period and other restrictions within this period do not start to come into force. The notice period is also imperative to enable us to make the necessary changes to commercial supply arrangements and CFL stocks held by npower.

**Appendix to RWE npower's response to Ofgem's CERT Supplier Guidance
Amendments consultation**

Monitoring

Q13. We believe that the current monitoring requirements in place are appropriate and set at a sufficient level to ensure suppliers meet their requirements.