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Urszula Kulpinska
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Ofgem
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15th September 2009

Dear Urszula,

Consultation on CESP 2009-2012 Supplier Guidance

The Energy Saving Trust is pleased to offer a short response to Ofgem's Community Energy Saving Programme (CESP) Generator and Supplier Guidance consultation document.

The Energy Saving Trust was established in 1992. We are the UK's leading organisation, working through partnerships, towards the sustainable and efficient use of energy by households, communities and the road transport sector and one of the key delivery agents of the Government's climate change objectives. Our response focuses on the key areas of the Energy Saving Trust's activities and related issues that are relevant to the consultation. Please note that this response should not be taken as representing the views of individual Energy Saving Trust members.

We are supportive of the suggested use of the Homes Energy Efficiency Database (HEED) as a repository of CESP data and look forward to discussing the finer detail of how this may work in practice. Use of HEED will enable fully independent checks to be undertaken, helping to avoid double counting of measures between CERT and CESP. Due to HEED also holding significant installation data from other sources, this approach will also be able to check for instances of double counting with other programmes such as Warm Front. It is vital that reporting requirements are also able to support evaluation efforts. In particular, evaluation activity must assess the effectiveness of different delivery partnership approaches and the impact and effectiveness of Home Energy Advice, for which there is significant uncertainty around appropriate scoring. Evaluation data requirements should be defined and included within supplier guidance, to ensure that all necessary data is provided in the right form and at appropriate times. We would be happy to discuss in more detail plans for CESP evaluation and likely evaluation data requirements.

Other points we would like to make are:

- New build. We do not believe that CESP funds would be best spent on new build projects, which are already the focus of other policy areas. We recommend that CESP focus on the existing housing stock where fuel poverty is more prevalent and CO2 emissions significantly greater.
- Spot checks. The nature of partnership arrangements under CESP, inevitably increases the risk of double counting of savings above what would be expected under CERT. While the signing of declarations by social housing providers is helpful, this should be supported by additional 'spot checks' to examine the accuracy of partner project plans and estimates of additional carbon savings.

Please get in touch should you like to discuss any of these issues further.

Yours Sincerely,

Ben Castle

Strategy Manager
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