

Dear Urszula

Having read your CESP consultation document and based on feedback from a number of utilities I have only a couple of comments to make on the document.

The first comment concerns para 3.10 & 3.11 IMD qualifying areas.

I understood that the CESP consultation undertaken by DECC did originally specify that only IMD areas (lowest 10%) would qualify for CESP. However, the outcome from their consultation indicates that they would actually be less "prescriptive" and would allow other areas to be considered, including rural*.

However, within the Ofgem document the IMD guidance is clearly very prescriptive and does not allow for this flexibility. In consultations with funding partners it has become apparent that they believe that they have to follow this guidance, despite recognising the potential of other areas. Can your guidance be revised, or the funding partners advised, in order that the DECC less "prescriptive" approach may be taken and that areas of high density measures can be considered within the process?

From the Kirklees social housing perspective (23300 properties) I have found that the density of measures within our low IMD areas is very low, leading to both unattractive and low impact schemes. As a result we have no schemes within the Kirklees area that would be suitable for CESP. The reason for this is mainly due to the previous forward thinking investment made by Kirklees through decent homes and other energy related schemes.

However, we do have other areas that in terms of density of energy measures make for very attractive and high impact schemes, but just miss out on the IMD test. I believe these areas also strongly reflect the "community whole house" approach of CESP and would provide ideal models for the scheme. We would like the opportunity to include at least one of these?

This leads me on to my second comment on the Ofgem document, I don't think it reflects the purpose or spirit of the CESP proposal. Whereas I understand that tight processes have to be in place in order to control the funding streams the community aspect and whole house approach seems to be lost in the detail of the document. I would hope that these themes would show through more clearly and/or eventually emerge.

I hope my comments prove useful and help promote the impact and scope of CESP.

*see: Impact assessment of proposals for implementation of the community energy saving program (29 May 09) para 85 & 86

Community Energy Saving Programme (CESP) Consultation Response and Analysis (June 2009) para 164-166

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