



Date: 29/09/2021

Elmhurst Energy's draft
response to:

DOMESTIC EPC REFORM
CONSULTATION

Prepared for: Scottish Government



1. Introduction

Elmhurst Energy are pleased that Scottish Government are seeking a call for evidence on 'Domestic EPC Reform Consultation in Scotland' and as such we are delighted to respond to each question in turn.

The Call for Evidence asked 7 questions and we have answered them all below. We hope you find the responses considered and useful for taking Energy Efficient Scotland forward in a progressive manner.

2. Summary

In summary, we fully support any improvements to the format of the EPC that makes it more accessible to the building owners and/or occupiers or anyone else associated with its regular use. This exact proposal is something that Elmhurst has previously put forward and have written a number of articles about so we welcome the Scottish Government listening to us and putting this forward for consultation. This is a good first step but we must be mindful about how the recommendations link up with the three new metrics.

We are very supportive that

- A clearer, more precise EPC will be created showing all metrics (energy, cost and carbon).
- No changes need to be made to the current data collection made during an EPC assessment.
- The changes made will help to educate the building owner/or occupiers to better understand the different measures required to improve the energy efficiency of their property in order to reduce the demand for heat, the changes required to have a zero emissions heating system and the impact this has on the properties running costs.
- This additional metric will help to highlight any areas where Government support is required due to the increased running costs of many zero emissions systems in turn helping to move away from fuel poverty.
- Promotion of energy advice.

We are concerned that

- Which of the three metrics do we focus on? Each play an important role, but each has a different role depending on who is looking at them. The EPC would benefit from a visual on all three metrics linking up to the recommendations.

3. Questions and Answers

1. Do you agree or disagree with the addition of the proposed Energy Use Rating? Please explain the reasons for your answer.

Elmhurst Energy have long campaigned for the inclusion of all three metrics (energy, cost and carbon) within the EPC document. We fully support this addition to the EPC and commend the Scottish Government for listening to our previous recommendations.

2. Do you agree or disagree with the name changes of the current EPC Energy Efficiency Rating & Environmental Impact rating to Energy cost rating and Carbon Emissions Rating respectively? Please explain the reasons for your answer.

We believe the name changes provide clarity. It also needs to be visual and clear to the consumer, any changes need to be explained within the EPC. We need to be mindful that all three metrics will potentially be viewed differently by the different end users.

3. Do you agree or disagree that the proposed EPC format will better equip building owners and/or occupiers to make informed decisions about improvements and/or changes to the energy efficiency and heating systems of their building? Please explain the reasons for your answer.

It is a good leap forward, we just need to be mindful that it is joined up with how we view recommendations. This needs to be worked on at the next available moment and certainly included within the next version of SAP. We suggest that the recommendations are also viewed in three ways linking to the different metrics.



4. Do you agree or disagree with retaining the information outlined in section 5? Please explain the reasons for your answer.

Whilst we don't want to hold up this consultation we do feel that there is a number of improvements that can be made to this section.

- We would suggest making the EPC more interactive by going online like England, Wales & NI. This would also allow for filters to be added depending on who is viewing the EPC.
- The use of the word assumed is constantly being mis-understood. We receive a large volume of calls from members of the public due to a lack of understanding of its meaning.
- We also field a large number of calls relating to the star ratings and their meaning. Ultimately we want to make the customer experience as smooth as possible and as clear as possible to the multiple end users.
- We also query why the EPC doesn't show all wall constructions and roof types regardless of size/HLP, this can be confusing to the home owner and makes them doubt the validity of their EPC.
- We feel that the indicative costs of recommendations are out of date and not reflective of the current climate. Why suggest the typical savings over 3 years and not 1 year?
- Heat demand – this is confusing to the average person. By making the EPC more interactive, certain sections like this can be filtered depending on the end user.

5. Do you think any additional information should be added to the EPC format? Please explain the reasons for your answer.

As we mention above our suggestion would be to make the EPC more interactive, and we would suggest bringing it in line with England/Wales and NI and being online rather than a pdf. We would recommend giving more information on funding mechanisms as well as having the full data set there for the consumer to see. Showing the inputs behind the EPC will help the homeowner to fully understand the process and relative outcomes and recommendations.

6. How do you think the metrics should be presented on the EPC? (More than one answer can be selected?)

- **Graph (current EPC ratings)**
- **Diagram**
- **Sliding scale**
- **Text only**
- **Other format**

Please explain your choice(s).

We agree with the suggested graph format as outlined in point 4.6 of this consultation. Another suggestion Elmhurst has made previously is something similar to the food roundel label on packaging. A consumer trial would be recommended before any changes are made.

7. Are there any other comments on the proposed EPC format you would like to add?

We fully support this change to the EPC to show the three metrics (energy, cost and carbon) and believe this can be a quick change to the EPC format.

Secondly, we welcome the idea of a complete over haul of the recommendations going forward to tie in with the new three metrics.

The delivery of the EPC being online works well in England, Wales and NI and we suggest a movement to this in Scotland too. Making the EPC more interactive will make the customer journey more enjoyable.