



## **Consultation: Carbon Emissions Reduction Target April 2008 to March 2011**

### **Response from UK Home Energy Conservation Association (UK HECA)**

#### **1. Introduction to UK HECA**

The UK Home Energy Conservation Association (UK HECA), previously the National HECA Forum, supports and represents local authority energy officers working to reduce the domestic carbon footprint and tackle fuel poverty. It comprises officers from the 379 Energy Conservation Authorities across the ten regional and devolved HECA fora in England and Wales, with the Northern Ireland HECA Forum and the Scottish HECA Officers' Network as associate members.

Fora and networks such as UK HECA can play a valuable role in supporting LA energy officers, particularly those who are new to the issues or whose authority may historically have provided limited leadership and support in this arena. UK HECA would therefore be very interested to explore with Government how it might be able to further help to reduce the up front resources required by local authorities in developing their approach to this agenda. UK HECA will of course be able to assist Government in the dissemination of the Guidance once it has been issued.

#### **2. General comments**

We strongly support:

- i. The overall target of lifetime savings of 42million tonnes of carbon and the proposal to double the level of activity under CERT from 2008-2011 compared to the level of the current EEC programme.
- ii. The transitional arrangements allowing suppliers to carry forward to CERT any actions/carbon savings surplus to their EEC2 obligations. Earlier uncertainty over these arrangements resulted in damaging disruption to the energy efficiency industry and programmes run by local authorities and other organisations. To prevent any such future problems and to support scheme continuity, it is recommended that similar arrangements should be put into place in good time to allow for a smooth transition to the next stage of CERT post 2011.
- iii. The inclusion in the CERT measures of combined heat and power.
- iv. The inclusion of the Priority Group flexibility option with the limitation of a 5% reduction in the PG obligation for this purpose.
- v. The inclusion of solid wall insulation and microgeneration (biomass and ground source heat pumps) for Priority Group households off the gas network. We hope this will lead to an increase in whole house solutions and maximise the social and environmental benefits that can be achieved. There is some concern however that solar thermal has been

excluded from the mix of measures available to these households and would ask that this decision be reconsidered.

### 3. Equity issues

- i. Whilst we would ideally prefer CERT to focus on maximising opportunities for carbon reduction, we agree that the alleviation of fuel poverty should remain a key objective in view of rising fuel prices and the Government's reluctance to put sufficient resources into other programmes to achieve its fuel poverty targets.
- ii. Continuing to prioritise priority group consumers is also justified because of the regressive nature of the raising funds via consumers' energy bills and by other market failings which disadvantage low-income households. For example, switching rates among pensioners and social classes D and E are lower, those in debt are barred from switching and tariffs most commonly used by poorer consumers are higher. We would like the Government to consider an increase to benefits to compensate fuel poor households for the EEC element of their fuel bill.
- iii. We are not entirely satisfied with the use of benefits as a proxy for fuel poverty. The use of an appropriate<sup>1</sup> SAP score combined with a simple definition of a needy household (eg over 60 or income below a set amount) could be more effective in addressing fuel poverty.
- iv. There are also concerns that Priority Group households in the private rented sector are also effectively being excluded from benefiting from CERT measures. Many of these households are already paying more than others for their fuel (eg through key meters) and are living in energy inefficient and frequently hard to treat homes. Directing some measures at landlords of properties occupied predominantly by Priority Group households could be considered under the 'Flexibility/Innovation' Option.

### 4. Concerns

We regret that:

- i. a 'total' exemption option has not been included particularly as this could have been paid to regional and local authorities that are well placed to prioritise and target improvements to priority group households in their areas
- ii. the exclusion of retrofitting insulation where it is technically feasible in the cavity walls of dwellings of timber frame, steel frame, concrete construction, system build or natural stone. Many can be safely and effectively insulated using alternatives to the common blown fibre insulation.

**ENDS**

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<sup>1</sup> 52% of households live in dwelling with a SAP above 30.