



Department of Energy and Climate Change: *“Consultation on Extending the Carbon Emissions Reduction Target”*

ACE response – March 2010

Introduction to the views of ACE

The Association for the Conservation of Energy is a lobbying, campaigning and policy research organisation, and has worked in the field of energy efficiency since 1981. Our lobbying and campaigning work represents the interests of our membership: major manufacturers and distributors of energy saving equipment in the United Kingdom. Our policy research is funded independently, and is focused on three key themes: policies and programmes to encourage increased energy efficiency; the environmental, social and economic benefits of increased energy efficiency; and organisational roles in the process of implementing energy efficiency policy.

We welcome this opportunity to respond to this consultation.

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Summary of the ACE response to the consultation

The extension of CERT presents an opportunity to sustainably increase the delivery of cavity wall and loft insulation, whilst developing the solid wall industry to a point where it is in a position to meet Government's ambitions as set out in the Household Energy Management Strategy¹ for the period post-2012. Meeting these twin objectives requires the introduction of a professionally installed insulation minimum at 65-70% of the overall CERT obligation, and a solid wall insulation minimum at 5% of the CERT obligation. The long term vision of Government is to increasingly focus on those homes in need of solid wall insulation. The solid wall industry therefore needs to be developed so that as lofts and cavities are filled, there is a smooth transition from cavity wall and loft insulation to the delivery of solid wall insulation.

The sustainable increase in cavity wall and loft insulation could be threatened however by the nature of the measures delivered during the extension period. ACE has concerns that if the space left by the removal of CFLs is filled by other dubious measures [and we have serious concerns about delivery of low flow shower heads under CERT] instead of through increasing the delivery of proven energy saving measures, then there is a real danger that insulation will not increase at the required rates.

Similarly, a failure to remove micro-generation measures from CERT for all but the super-priority group will seriously threaten the integrity of the programme by creating a real potential for installations to receive a carbon score under CERT that would have been installed under FIT anyway. If this happens, those installations will have saved no additional carbon and will reduce the number of other effective measures that are installed. Government must ensure that this does not happen.

Overall, with the notable exception of CFL delivery, CERT has proved a successful programme for reducing carbon emissions, providing a net benefit to the UK economy. This does not disguise the fact that CERT is a regressive policy to those in fuel poverty; the nature of CERT means that the fuel poor will always receive disproportionately few measures from the programme, whilst the costs are felt by all households. Government must understand that the small changes in targeting, whilst welcome, will not overcome the fundamental problem – that programmes funded through levies on energy bills will always worsen fuel poverty unless the benefits are targeted exclusively at the fuel poor. Instead, Government must acknowledge that any further extension to an overall positive scheme such as CERT must be complemented by a commensurate increase in spending on publicly funded fuel poverty programmes (currently Warm Front).

¹ Government's Household Energy Management Strategy indicated that SWI will be required in around 2.3m homes. HM Government (2010) Warm Homes, Greener Homes: A Strategy for http://www.decc.gov.uk/en/content/cms/what_we_do/consumers/saving_energy/hem/hem.a.spx

Specific questions and answers

Q1 Do you agree that there should be an extension to CERT rather than a new obligation period i.e. that the current CERT mechanism is largely retained but the end date extended to December 2012? If not, why not?

1. Yes, ACE agrees that extending CERT is much more sensible than creating a new obligation period, for all the reasons set out in the consultation document, but also because this will reduce costs to energy suppliers and therefore the amount passed on to customers. It should also make it easier for suppliers to meet the sub-targets set by Government on the Super Priority Group and the Insulation Minimum (including the minimum amount of solid wall insulation that we propose in subsequent answers) since they will be able to use the additional time between the date the legislation is passed and March 2011.

Q2 Given the potential costs, do you agree that the size of the extended CERT obligation should be increased pro rata to the existing overall CERT obligation (which was increased by 20% in summer 2009)? If not, what should the level of the new overall target be, and why?

2. It is vital that the remainder of CERT is used to deliver a sustainable increase in the delivery of cavity wall and loft insulation, as well as ramping up the delivery of solid wall insulation to prepare this industry for the greater effort required post-2012. As such, ACE believes that the most important changes to CERT are the introduction of an overall professionally installed insulation minimum, and included within this a minimum amount of solid wall insulation. Advice from the insulation industry suggests that the introduction of these two changes, in combination with a pro rata increase in the size of the obligation, should result in such a sustainable increase. As such, ACE supports a pro rata target, subject to the following four significant caveats below.
3. First, it is important to understand that those views are based on the key assumption that the levels of CERT activity reported to OFGEM thus far are accurate. If, however, the levels of reported activity are considerably lower than the work that has actually been carried out (but not yet declared to OFGEM), then the pro rata increase which we favour is unlikely to provide the required sustainable increase in delivery.
4. Second, this relies on the assumption that, with the removal of CFLs from CERT, installation rates for insulation and other hard measures will be ramped up to take their place. However, if other measures similar to CFLs (perhaps low flow showerheads of the kind discussed in paragraph 44 below) step into the breach instead, a higher overall target would be required in order to achieve a sustainable increase in delivery.
5. Thirdly, given that CERT is fundamentally regressive (see paragraph 9), and that this is exacerbated as the size of the obligation is increased, any such further expansion of CERT **must** be accompanied by a commensurate increase in Government spending on its fuel poverty programmes (currently Warm Front).

6. Finally, whilst we note that the overall level of ambition, in terms of CO2 emissions reduction, is broadly in line with the UK Government's 2020 greenhouse gas emissions reduction target, it is not sufficiently ambitious to deliver the Scottish Government's 42% emission reduction target by the same year. This is exacerbated when one considers the non-traded sector in Scotland will actually be required to deliver 47% by 2020 if, as expected, the EU emissions target remains 20%². It is further exacerbated by the Scottish Government estimate that Scots have historically received 30% fewer CERT measures than their pro rata share³. Government may wish to consider requiring a minimum amount of CERT to be delivered in Scotland to assist in the achievement of the 42% (47% non-traded) target, and address the historic under-investment.
7. We disagree with Government over the assertion, repeated throughout the consultation document, that 'supply chain restrictions' mean that the insulation industry (and the cavity wall industry in particular) cannot deliver at a higher rate than at present. The experience of our member companies argues strongly against this, with many having to export products and scale back production levels due to a lack of domestic demand. The issue here is not with constraints in the manufacture, delivery and installation of CWI, but with ensuring delivery rates that are *sustainably* increased over the coming years.
8. At the same time, it is vital for Government to plan ahead and establish a smooth transition from CWI and LI to the delivery of solid wall insulation. Government has already announced its strategy to deliver 7 million 'eco-upgrades' in households by 2020⁵, to which solid wall insulation will make a major contribution. To achieve this, SWI will need to have reached maturity by the time CWI and LI are tailing off in 2015. At present the SWI market is tiny⁶, and it seems very unlikely that suppliers will spontaneously deliver it in the fanciful quantities set out in the illustrative mix⁷. To help ensure the smooth transition in future, Government must boost the industry now, through the introduction of a SWI minimum (see Q9).

Q3 Do you agree that under the CERT extension there should be a requirement for ensuring a proportion of the Priority Group target to be delivered to a subset of the most vulnerable customers (a Super Priority Group), who are also more likely to be in fuel poverty? Please explain your answer.

9. ACE has concerns over the distributional impacts of CERT, which are far greater than those under EEC. DECC figures, supplied to ACE on 16 February 2010, reveal that only

² Committee on Climate Change (2010) Scotland's path to a low-carbon economy. Available online: <http://www.theccc.org.uk/reports/scottish-report>

³ Scottish Government (2009) Conserve and Save - A Consultation on the Energy Efficiency Action Plan for Scotland. Available online <http://www.scotland.gov.uk/Publications/2009/10/07160816>

⁵ HM Government (2010) Warm Homes, Greener Homes: A Strategy for Household Energy Management http://www.decc.gov.uk/en/content/cms/what_we_do/consumers/saving_energy/hem/hem.a.spx

⁶ Current installations in CERT = 22,612 after 7 quarters

⁷ (39,000 EWI, 100,000 IWI and 27,000 insulated wallpaper: 156,000 installations in 21 months!)

24% of the current Priority Group are in fuel poverty. This supports Brenda Boardman's assertion that those in fuel poverty now pay £200m but receive only £125m in benefits⁸. This regressiveness has come about due to the change from EEC2 to CERT that reduced the proportion of support going to the Priority Group (from 50% to 40%), and widened the eligibility (focusing support on over 70s, many of whom are able to pay, rather than on low income households). Anything that can improve this situation and increase the proportion of fuel poor households eligible for CERT has to be supported.

10. However, this view is subject to the overriding caveat that creating a Super Priority Group with the aim of better targeting the fuel poor will inevitably lead to increased costs overall. Since these costs will be spread across all energy bills, and since the improved targeting will not be sufficient to overcome the fact that the fuel poor receive proportionally less support through CERT, the fundamentally regressive nature of the programme will persist. This tension sits at the heart of CERT, which is essentially a carbon saving programme on to which a social policy objective (i.e. tackling fuel poverty) has been "bolted". Rather than conflating environmental and social goals in one programme (which in this case compromises the achievement of each), any further expansion of CERT **must** be accompanied by a commensurate increase in Government spending on its fuel poverty programmes (currently Warm Front).
11. This is an issue that can no longer be fudged by Government. Additional levies on energy bills to achieve environmental objectives are effective, but can only be viewed as 'fair' if comprehensive fuel poverty programmes are improving the energy efficiency of the homes of those most in need, and for whom the cost of these programmes is felt most deeply.

Q4 Do you agree that Pension Credit recipients should be at the heart of the Super Priority Group? Should Child Tax Credit households that qualify for the Priority Group also be included in the super Priority Group? If not, what groups would you suggest, and what evidence do you have to support alternative proposals?

12. Yes, ACE supports the inclusion of Pension Credit recipients, and we also support the inclusion of those receiving Child Tax Credit.
13. The super-priority group should receive their pro rata share of the minimum 5% solid wall insulation that we propose within this consultation.

Q5 Do you think that lower income thresholds or sub sets of the identified benefit groups should be identified to form the Super Priority Group if this means it is likely to result in better targeting of those with a greater propensity to be in fuel poverty? Is your answer the same if this required a lower 'super' Priority Group target to be applied?

⁸ Fixing Fuel Poverty, Brenda Boardman, Earthscan 2009

14. There is a greater propensity for those in the identified groups to be in fuel poverty; indeed with the absolute numbers of households doubling in the past three years, the likelihood increases accordingly.

Q6 Do you agree that we should introduce a limited list of heating and insulation measures of which Super Priority Group households benefit from at least one? How far should this list extend? Are there other ways of promoting these measures and so significant bill savings?

15. Yes. This is a very sensible approach. It should really apply to all beneficiaries from CERT activity.
16. ACE would also suggest that Government seeks to link the provision of measures under CERT to the provision of social tariffs by energy suppliers. The Department for Work and Pensions consultation on the Energy Costs Support Scheme (2009) described how those receiving the Guarantee Credit would receive around £100 in credit from their energy company. ACE strongly suggests that any householder eligible for the credit that lives in a home with an unfilled cavity, an 'unlagged' or minimally lagged loft, or an old inefficient boiler should have these improved by the energy company. This will go much further towards assisting these households with their energy bills than the credit alone. We welcome the prospect of this option being incorporated into the Energy Bill 2010.

Q7 Do you think that the options and incentives proposed will encourage more help to vulnerable rural households? What else can we do to help rural households access CERT?

17. No, ACE does not see how any of the proposals within this consultation would encourage an energy supplier to deliver measures into rural areas. However, the minimum percentage for solid wall insulation requirement that we propose in this consultation may well help rural households become more attractive to energy suppliers.

Q8 Would a CERT obligation based on energy supplied (kWh) by an energy supplier to its customers, rather than its customer numbers, represent a fairer, more equitable method by which to apportion the overall CERT obligation and thus lead to a more equitable scheme?

18. Yes. Whilst the way that energy suppliers pass costs on to their customers is very opaque, it is sensible for Government to assume customers are charged in the same way that suppliers are 'charged'. If that is so, then we must assume that the costs incurred by suppliers in meeting their CERT obligation are currently passed on to customers evenly, meaning that customers pay the same absolute amount regardless of their consumption level. This is clearly inequitable, as those consuming less energy (most commonly those on low incomes) are being charged more for CERT as a proportion of their bill than those consuming large amounts of energy. We therefore support OFGEM'S recommendation that the CERT obligation be based on annual sales (i.e. kWh

supplied), rather than customer numbers. In theory this should improve the equity of the supplier obligation.

19. However, it is important to note that there is no guarantee that, even if the recommended change is made, suppliers will pass their costs on to customers in a more equitable way. Government must therefore continue to look at ways in which the obligation can be made more equitable, with high income households with typically higher consumption profiles paying more in absolute terms as part of their energy bills to fund the programme.
20. An advantage of the amended approach recommended by OFGEM is that if the obligation is levied on suppliers in terms of the number of units sold, they may be encouraged to assist their consumers further in reducing their demand. The supplier with the lowest average consumption would have the lowest CERT obligation to pass on in their unit costs.

Q9 Do you agree with the proposals for setting an insulation minimum and removing CFLs as eligible measures so as to secure and drive insulation levels?

21. Yes. ACE expects that the minimum level of insulation proposed will be greatly exceeded by energy suppliers (see Q10) though it is deeply disappointing that DECC have not made explicit the percentage of insulation that would be delivered based on the figures in the illustrative mix. Whilst the insulation minimum may not increase the amount of insulation currently being delivered, we believe that an insulation minimum of 65-70% will help deliver confidence to the professional installation supply chain.
22. In addition, ACE strongly recommends the introduction of a solid wall insulation minimum, to give some certainty to this relatively small but increasingly important sector. Given future targets⁹, it is vital that this industry grows and has some certainty over delivery rates in the immediate future. Whilst Government expect CESP to deliver an increase in SWI, it is feasible for energy suppliers to meet their obligations through CWI instead, relying on a 'multiple measure' uplift. Such a minimum would give a timely boost to the industry and help achieve the transition from CWI/LI to SWI discussed in Q2.
23. The need to ramp up the number of SWI installations is amply illustrated in Table 1.

⁹ Government's Household Energy Management Strategy indicated that SWI will be required in around 2.3m homes. HM Government (2010) Warm Homes, Greener Homes: A Strategy for Household Energy Management
http://www.decc.gov.uk/en/content/cms/what_we_do/consumers/saving_energy/hem/hem.a.spx

Table 1

	SWI (installations counted in delivery year)	Rate rise from previous programme
EESoP (1994-2002)	N/A	
EEC1 (2002-2005)	23,730	
EEC2 (2005-2008)	35,278	49%
CERT (to Q7)	22,612 (over 3 yrs= 38,763)	9.9%
	97,771	

24. As can be seen from Table 1, SWI installations for the full nine years of the supplier obligation (EECs 1 and 2, and CERT) are expected to be under 98,000 (excluding CESP) – and they are not rising as needed. CERT is on track to deliver under 39,000 SWI installations in three years. This is very far from the 150,000 expected in the illustrative mix¹⁰. Of still greater concern is the fact that the encouraging 49% rise in installation rates between EEC1 and EEC2 has dropped to around 10% in the transition between EEC2 and CERT. This is the very opposite of what we should be seeing.
25. Industry estimates that 30-35,000 SWI installations are carried out every year (half in new build, half in existing homes)¹¹. This needs significant acceleration if we are to meet the Committee on Climate Change indicator targets of 1.2 million SWI installations by 2017 and 2.3 million by 2022 (above 2007 levels)¹². To achieve these targets would require an average annual rate of 177,000 SWI installations from today.
26. ACE supports the exclusion of CFLs from CERT. Whilst there are some niche CFLs which might benefit from retention (such as dimmable CFLs), the levels of subsidy offered mean that households would simply buy a dimmable CFL at a lower cost than a non-dimmable lamp, regardless of whether one was needed or not. Given the current phase out of incandescent lamps, it is correct to remove CFLs completely.

Q10: Subject to your views on the desirability or otherwise of introducing an insulation minimum what level of minimum do you consider justifiable? Within this, should the minimum exclude DIY insulation as a qualifying measure?

27. ACE believes that an insulation minimum of 65-70% will give some certainty, though it is unlikely to drive additional insulation delivery. Looking at the contribution towards meeting the CERT targets so far, once CFLs are removed, 88% of the remainder has been delivered through insulation¹³, 70.5% through professionally installed insulation¹⁴.

¹⁰ DECC, *Amendments to the Carbon Emissions Reduction Target: Partial Impact Assessment*, 2009

¹¹ Purple Market Research, *UK Domestic Solid Wall Insulation: Sector Profile*. Report for the Energy Efficiency Partnership for Homes, 2008

¹² Committee on Climate Change, *Meeting Carbon Budgets – the need for a step change*, *Progress Report to Parliament*, October 2009, page 98

¹³ To the end of Q7, 28.9% of CERT had been delivered through lighting, 62.3% through insulation. Insulation therefore makes up 88% of the residual, once CFLs are removed.

28. Concerns remain about the veracity of carbon savings attributed to loft insulation, with the risk of double counting. In addition, the consultation document makes clear that the Government wishes to see an increase in the number of professional employees “to meet our challenging insulation delivery aspirations”. For these reasons we believe that DIY insulation should be excluded from the minimum.
29. ACE propose that the solid wall insulation minimum be set at 5% of the overall CERT target. This would ensure around 50,000 installations, a modest figure representing two-thirds fewer installations than set out in the illustrative mix.

Q11: Do you have any evidence on alternative options which could successfully drive a sustainable increase in insulation levels?

30. As proposed in our answers to questions 9 and 10, ACE believes that the introduction of a solid wall insulation minimum percentage would offer the most sustainable increase in insulation levels, developing the industry to be able to meet Government ambitions.
31. ACE also strongly recommends the introduction of Stamp Duty rebates and council tax rebates for householders implementing the recommendations on their energy performance certificate, as a way of incentivising action at a key trigger points.

Q12: Do you agree with the proposals for ensuring that only the most energy efficient products and appliances should be eligible measures under the CERT extension? Do you have views on how else this can be best delivered?

32. Yes, we agree with this proposal. The use of a sunset clause seems very sensible.

Q13: Do you agree that only providing carbon scores for A rated LEDs provides the greatest certainty on delivering carbon savings from lighting products?

33. ACE agrees that only A rated LEDs should be provided with a CERT score. However, we have concerns over the scores given to LEDs. LED lamps and luminaries are still relatively expensive and will benefit from the powerful market transformation that CERT enables. Unfortunately LED efficiency is being measured against CFLs and not against the lamps and luminaries they replace. Current development of LEDs is focussed on areas such as halogen reflector lamps and linear halogen exterior lighting. Neither of these areas currently uses CFLs and therefore it is appropriate to measure the savings against the lamps or luminaries they are replacing. As such, we propose that Government should:

Figures: Ofgem (2010) CERT Update: Issue 7

<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/CU/Documents1/certfeb10.pdf>

¹⁴ Based on information supplied by Ofgem on the amount of DIY loft insulation supplied, ACE calculates that DIY loft insulation accounts for 19.5% of the overall carbon savings attributed to insulation measures. As such, professionally installed insulation accounts for 70.5% of savings under CERT once CFLs are removed. (20% of insulation means, once CFLs are removed, 20% of the 88% residual due to insulation, i.e. 17.5% is through DIY LI. 88% - 17.5% gives 70.5% due to professionally installed insulation.)

- Amend the carbon score for LEDs to reflect the real savings by comparing them with the lamps they actually replace.
- Amend the carbon score for LED Luminaires to actively develop their adoption into the market place.

Q14: Should micro-generation measures remain eligible measures under the CERT extension? If so, it may be sensible to introduce new rules e.g. that these measures or subsets of these measures only remain eligible to Priority Group and/or proposed Super Priority Group households; or no longer be eligible for a carbon uplift; do you agree?

34. Only the Super Priority Group should be eligible for micro-generation measures under CERT. ACE agrees that there are problems relating to FIT and low income households, and we raised these strongly with Government during our consultation response to the Renewable Electricity Financial Incentives consultation¹⁵. Retaining micro-generation measures under CERT may allow some householders on low incomes - who would not have done so otherwise - to gain access to the FIT scheme. In the interim period, ACE strongly encourages the Government to start devising means by which low income and vulnerable households can access and benefit from micro-generation in the post-2012 period.
35. However, ACE urges Government in the strongest terms to remove micro-generation measures from CERT for all other households. Micro-generation measures are now supported under the Feed-In-Tariff scheme for the 'able-to-pay'. In the same way, renewable heating measures should be removed once the Renewable Heat Incentive comes into force in April 2011. These are measures that will have (if the mechanisms have been designed correctly) sufficient support without needing to be within CERT. If the support is not sufficient, this should be addressed by amending the FIT or RHI, not by compromising CERT.
36. It is vital that Government makes these changes as without them, the risk of double counting is manifest. These are measures for which there are large CERT credits available, which will likely be offered and installed via energy suppliers. It would not be difficult for foul play to result, and for an installation that was solely requested under the incentives offered by FIT, to additionally accrue CERT credits. This would reduce the amount of additional carbon savings achieved by CERT, and reduce the number of truly additional CERT measures delivered. It must not be allowed.
37. As proposed in our answers to previous questions, ACE believes that Government should instead support solid wall insulation by requiring a minimum percentage of SWI to be delivered by suppliers. SWI is the only measure that falls outside of those currently

¹⁵ Association for the Conservation of Energy (2009) Response to the DECC consultation on Renewable Electricity Financial Incentives
[http://www.ukace.org/publications/ACE%20Response%20\(2009-10\)%20-%20DECC%20Renewable%20Electricity%20Financial%20Incentives.pdf](http://www.ukace.org/publications/ACE%20Response%20(2009-10)%20-%20DECC%20Renewable%20Electricity%20Financial%20Incentives.pdf)

supported or planned to be supported under Government schemes: it does not meet the highly cost-effective criteria for suppliers under CERT at present, but neither will it receive the support soon to be provided to microgeneration and renewable heat technologies. This amendment to CERT presents a timely opportunity to address this omission, and scale up delivery to meet the ambitions set out in the HEM Strategy.¹⁷

Q15: Do you think that the cost, carbon and wider assumptions set out in the associated impact assessment are fair? If not, please provide evidence to support how the assumptions should be amended.

38. The issue of assumed loft area when translating DIY into lofts remains.
39. In addition, we have concerns over the lifetime of the carbon savings applied to different measures. Specifically, we query why solid wall insulation (external, internal and insulated wallpaper) have lifetimes of 30 years, whilst DIY loft insulation (liable to be installed improperly) has a lifetime of 40 years. This seems at odds with the amount of time the measure will be effective for.
40. Additionally, ACE queries why the assumptions within the illustrative mix for the proportion of loft insulation being delivered into lofts with less than 60mm differs between that which is DIY and that which is professionally installed. The vast majority of professionally installed loft insulation is assumed to be delivered into lofts that already have at least 60mm of insulation. This compares with an assumption that only half of lofts receiving DIY loft insulation have at least 60mm of insulation. The difference inflates the carbon savings associated with DIY loft insulation, though the logic for this difference is unclear.
41. We note that the illustrative mix assumes that the number of heating controls which will be installed during the final 21 months of CERT will sum 2,000,000. This compares with the illustrative mix for the current period of just 30,000. Given that the credits for this important technology are not being altered, it is not clear why this market transformation is anticipated.

Q16: Do you think that the current reporting and monitoring arrangements are robust enough to ensure that Ofgem identify and avoid the risk of double counting between different programmes? If not, how can this risk be avoided?

42. No. Government raised the issue of reporting during the 'Amendments to CERT' consultation in 2009¹⁸ when "the overwhelming majority of respondents and nearly all

¹⁷ HM Government (2010) Warm Homes, Greener Homes: A Strategy for Household Energy Management
http://www.decc.gov.uk/en/content/cms/what_we_do/consumers/saving_energy/hem/hem.a

spx

¹⁸ DECC (2009) Amendments to the Carbon Emissions Reduction Target

<http://www.decc.gov.uk/en/content/cms/consultations/open/cert/cert.aspx>

those who commented supported the wish to see improved reporting¹⁹.” The voluntary agreements put in place are gradually leading to information being placed into the HEED database, but are not strong enough to fulfil the vital role they now have. Information must now be collated from CERT, CESP, FIT and RHI, and only the timely entry of this information into the HEED database will give the required assurances that suppliers are not using the multiple schemes to commit foul play. Suppliers must provide this information at regular intervals, after having banked all their installed/delivered measures. Only through this will Ofgem (and others) be able to assess the level of double counting. Reporting to date has been poor – there are huge uncertainties over the level of double counting associated with DIY loft insulation yet Ofgem has been unable or unwilling to act. This offers no assurance that Ofgem is rigorous and vigorous enough to identify future double counting, both within and between programmes.

43. This information is available and can be applied to DIY activity as well : we commend the arrangement made between Scottish & Southern and Focus DIY to ensure all loft insulation purchases are ascribed to a specific address.
44. Transparent reporting must be extended to the general public. CERT (and CESP) will provide important lessons to inform future delivery, yet the reporting on measures by Ofgem both vague and opaque. Ofgem should require suppliers to bank their measures every quarter, and then provide these online within an Excel spreadsheet detailing each measure type (not measure category as at present), the number of installations, and the carbon saving attributed to it.
45. Finally, we are greatly concerned about the process of approval of new measures by OFGEM. For instance, in recent months three types of low flow shower heads have become acceptable measures, offering extremely generous rewards for installation. Several million have been distributed in consequence. We are concerned at the absence of robust monitoring regarding to whom these are being sent (whether these have been formally requested, or are being distributed randomly); whether these have been installed at all; and how often the showers in question are actually used. It is only if these questions are satisfactorily answered that the correct savings can be attributed.

¹⁹ DECC (2009) Government response to the Amendments to the Carbon Emissions Reduction Target Consultation
http://www.decc.gov.uk/Media/viewfile.ashx?FilePath=Consultations\carbon%20emissions%20reduction%20target\1_20090710120622_e_@@_CERTPlusconsultationresponse2.pdf&filetype=4