Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership encompasses the truly diverse nature of the UK’s energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership.

Our members turn renewable energy sources as well as nuclear, gas and coal into electricity for over 27 million homes and every business in Britain. Over 730,000 people in every corner of the country rely on the sector for their jobs, with many of our members providing long-term employment as well as quality apprenticeships and training for those starting their careers. The energy industry invests £12bn annually, delivers £88bn in economic activity through its supply chain and interaction with other sectors, and pays £6bn in tax to HMT.

Energy UK strongly believes in promoting competitive energy markets that produce good outcomes for consumers. In this context, we are committed to working with the Scottish Government, regulators, consumer groups and our members to develop reforms which enhance consumer trust and effective engagement. At the same time, Energy UK believes in a stable and predictable regulatory regime that fosters innovation, market entry and growth, bringing benefits to consumers and helping provide the certainty that is needed to encourage investment and enhance the competitiveness of the UK economy.

These high-level principles underpin Energy UK’s response to the Scottish Government’s Energy Efficient Scotland Consultation. This is a high-level industry view; Energy UK’s members may hold different views on particular issues. We would be happy to discuss any of the points made in further detail with the Scottish Government or any other interested party if this is considered to be beneficial.

Executive Summary

Energy UK is grateful for this opportunity to respond to the Scottish Government’s consultation on its Energy Efficient Scotland Programme. Energy efficiency is an enduring solution to help consumers reduce their energy consumption, improve the comfort of their homes and is central to tackling fuel poverty and meeting carbon reduction targets. We welcome that the Scottish Government has recognised this.

The Energy Efficient Scotland Programme is very ambitious. We welcome that the Scottish Government has provided long-term policy certainty and sets out a clear trajectory for the housing sectors in terms of the standard they will be expected to meet by 2040. The different housing sectors are incredibly diverse and different mechanisms/levers will be required to ensure that all houses can reach EPC band C by 2040.

However, the success of the Energy Efficient Scotland Programme will depend on a number of things without which there is a risk that the Scottish Government will not meet its ambitious targets for the different sectors. Energy UK would like to see more detail provided by the Scottish Government on what mechanism/levers will look like for different sectors.

In addition, we would have liked to see a greater emphasis on providing detail on funding as this will be a critical area over the next two decades. We acknowledge that there are existing funding streams available but are concerned that it does not seem that the Scottish Government has spent enough time considering how these funding streams can best be aligned and maximised across the Programme.
We note that the Scottish Government in its consultation has proposed to review progress towards meeting some of the standards. Given the longevity of the programme, Energy UK would urge the Scottish Government to review all the standards and put in place appropriate milestones. This will enable the Scottish Government to intervene if it looks like standards are not going to be met in line with the timetable. It should also help the Scottish Government monitor how the supply chain is coping. The Energy Efficient Scotland Programme is a great opportunity for the supply chain to grow and develop but it will also be challenging especially if households and landlords only take action towards the end of the programme. We are concerned that the pressure this would put on the supply chain could be too much and lead to improvements not being made as well as higher costs for consumers.

In addition, with the scale of the programme in mind there will be a need for a robust quality and standards framework to be put in place to underpin the programme. Without a stringent framework in place, consumer confidence in energy efficiency could be undermined before the programme even gets off the ground.

Lastly, Energy UK considers that it will be of critical importance that the Scottish Government clearly sets out how the standards will be enforced in each of the housing sectors.

**Detailed responses to questions:**

**Improving Our Homes**

1. **What are your views on our proposal for owner-occupied and private rented properties to achieve the Long-Term Domestic Standard EPC Energy Efficiency Rating Band C by 2040 at the latest?**

   Energy UK strongly welcomes the Scottish Government’s commitment to energy efficiency and to ensuring that all homes can be upgraded to a good energy efficiency standard to the benefit of households. The Energy Efficient Scotland Programme is incredibly ambitious and the Scottish Government is to be congratulated on its progressive approach to energy efficiency.

   In particular, we welcome the long-term policy certainty the Scottish Government will be providing for all of the housing sectors on the direction of travel in terms of the standards domestic buildings will be expected to meet by 2040.

   The programme is ambitious and will require significant funding to be made available. Energy UK acknowledges that some funding can be leveraged by requiring action through legislation. However, for the owner-occupier sector you are likely to require a number of different mechanisms for funding energy efficiency particularly for those households in the sector who are fuel poor. These households will not be able to afford the improvements required to meet the standard. The Scottish Government will therefore need to consider providing the required funding.

   Overall, the issue of funding will be critical and we would urge the Scottish Government to ensure that its final decisions on the programme is made on the basis that the proposals will be fully funded. There is already a number of funding mechanisms available and it will be imperative that the Scottish Government carefully considers how this funding can be aligned to help deliver the overall programme.

2. **Do you think we should allow for situations where a lower standard is acceptable?**

   Given the diverse nature of the housing stock in Scotland, Energy UK recognises that there will be situations where a lower standard should be acceptable. However, we strongly consider that every household regardless of the sector in which they live should be able to benefit from energy efficiency improvements. For this reason, we believe that only a very limited number of exceptions should be allowed. This could for example be for listed buildings, buildings in the highlands and islands, where a property owner can demonstrate that improvements would simply not be cost-effective or where they simply are unable to obtain permission from the householder (in the rented sector).

   The Scottish Government will need to be very clear on the situations in which a lower standard is allowable and will need to carefully set out how the standards will be enforced. It will also be important
that the Scottish Government acknowledges that some properties might be subject to a temporary exemption and should clearly set out when the temporary exemptions will no longer apply. This could be where a change of tenancy takes place or where a property gets put up for sale. These would be useful opportunities for improvement work to take place and in relation to the owner-occupier sector it would be beneficial if the Scottish Government could set out who would be expected to carry out the work (seller or buyer).

3. **Do you think we should allow for situations where a longer period for improvement is allowed? Please explain your answer, giving examples?**

Energy UK believes that the Scottish Government should allow for a situation where some properties are permitted a longer period in which to make the improvements. Examples of such properties could be those that are situated in the highlands and islands where delivery of improvements can be harder to achieve. However, we consider that such a period should be limited as it is vital that all households are able to benefit from energy efficiency improvement regardless of the property in which they live.

Energy UK does not necessarily believe that the period should be specified but rather should focus on the opportunities that will come up when a property changes hands (through buying/selling/change of tenancy). Making use of these opportunities through the requirement that a property should have an EPC will provide households and landlords with a greater degree of understanding of the improvements that will be needed.

4. **We are proposing that the definition of a cost-effective measure is that it should pay back over its lifetime. What are your views on this definition?**

In principle, Energy UK considers that any energy efficiency improvements made to a property should be meaningful and cost-effective. We therefore, welcome that the Scottish Government shares this focus.

However, Energy UK is concerned about the proposed definition of ‘cost-effective’ as outlined in the consultation document. While the definition is easy to understand and should in theory be quite workable, we consider that the definition could lead to a number of unintended and undesirable consequences.

The estimated savings of a measure are notoriously difficult to calculate as is the pay-back period and for some improvements, the lifetime of the measure will be very long. It is unclear to Energy UK whether the proposed definition would allow for situations where there are no savings as a result of energy efficiency improvements. It is often the case that fuel poor household simply cannot afford to heat their homes properly and as a result will not be turning on their heating. The installation of energy efficiency measures should improve this situation in that these households will be able to afford to heat their homes and use the needed electricity/gas. In these instances, there would be no savings.

In addition, as highlighted above, the estimated lifetime for some measures is very long. Energy UK is concerned that the proposed definition does not seem to take into account whether a measure is affordable in the first place for the households who will be funding them. If a household or landlord is looking to invest to insulate a solid wall property, the cost for this will be very high. The Scottish Government should, therefore, consider whether additional support for these types of measures can be provided through grant funding etc.

Lastly, we note that there is a risk that the proposed definition will restrict the number of options available to households or landlords which could ultimately result in properties not being cost-effective to treat and thus not meeting the required standard. This would make the overall Long-Term Standard difficult for the housing sector to meet. The Scottish Government should carefully consider how it might address the points raised above in finalising its definition of what makes a measure cost-effective.

5. **What are your views on the issue of air quality in relation to the Long-Term Domestic Standard?**
Energy UK would support the Scottish Government taking steps to factoring air quality into its considerations around the Long-Term Domestic Standard.

6. The EPC rating of a property can be affected by changes to the underlying methodology and to fuel price data. How do you suggest that the Programme takes account of this in setting the Long-Term Domestic Standard?

Energy UK recognises the challenges around how an EPC rating can be affected by changes to the underlying methodology and to fuel price data. The Energy Efficient Scotland programme is a long-term scheme that will span over two decades. We consider that it is very likely, that there will be significant changes to technology and fuel prices over that time span and it will therefore be critical that the EPC system is able to adapt in line with these changes. We would urge the Scottish Government to consider whether a process could be put in place to allow for new technologies that would improve the energy efficiency of a property to be recognised more quickly as a worthwhile measure.

In our response to question 10 in the consultation on the Energy Efficiency Standard for Social Housing Post-2020, Energy UK expressed support for the approach the Scottish Government is looking to take on this in the social rented sector. We would urge the Scottish Government to consider whether a similar approach could be taken for the other sectors so as to align policies across the different housing sectors and take the same approach for the Long-Term Domestic Standard. This could also widen the access to the potential benefits to more households throughout the period leading up to 2040.

7. What are your views on the proposal that all PRS properties meet EPC Energy Efficiency Rating Band C by 2030?

Energy UK strongly considers that landlords have a duty to ensure that the properties they let out are of a good standard and affordable for tenants to heat. We, therefore, welcome the proposal that all PRS properties should meet EPC band C by 2030. In particular, it is welcome that the Scottish Government has clearly set out what will be expected of the sector over the next decade as this will allow landlords to plan for and fund the required improvements.

We further note that a robust enforcement framework to underpin the standard will invariably be required and the Scottish Government should carefully consider how such a framework could be designed.

8. What are your views on our proposal for an initial period of encouraging action?

Energy UK considers that mandating action in the owner-occupier sector is a difficult proposition. Instead, we believe it would be more useful for the Scottish Government to focus all of its energy on encouraging action on energy efficiency. Encouraging the uptake of energy efficiency in the owner-occupier sector is notoriously difficult. Governments have taken different approaches to try to kick-start an able-to-pay market for energy efficiency and the experience has been that households in this sector simply do not ascribe value to energy efficiency. Energy UK believes that the key to achieving the proposed standard will be for the Scottish Government to utilise a range of levers both regulatory and fiscal as well as provisions for information for households on energy efficiency.

Furthermore, we note that the proposal for the standard for the owner-occupier sector has the longest timeframe out of the different sectors. In line with the proposal for the social rented sector, we consider that the Scottish Government should commit to reviewing progress and should set clear milestones for the sector. This will enable the Scottish Government to take action if it looks like that standard for this sector will not be met.

9. What information would be useful for householders to be able to access on how to achieve EPC Energy Efficiency Rating Band C before 2030?

Requiring properties to have an up-to-date EPC is perhaps the most useful way to provide households/landlords with an awareness of what improvements can be made to their properties. The Scottish Government should, therefore, consider whether there are further opportunities to mandate the commissioning of an EPC outside the purchase of a property. This could be around when house renovations are due to take place or when a change of tenancy occurs. If the Scottish Government
intends to use EPCs as a means of providing households/landlords with this additional information, it is important that the format of the EPC is reviewed as a matter of priority to ensure that their format is ‘fit for purpose’.

In addition, we note that a lot of information for households will already be available via Home Energy Scotland (HES). The Scottish Government should continue to work with HES to determine whether advice can be streamlined. We further note that one of the key recommendations in the UK Government commissioned Each Home Counts (EHC) Review was for an Information Hub to be designed to provide home energy efficiency advice to households which would also include information on consumer protection. This Information Hub is in the process of being made available as part of the implementation of the EHC Review recommendations. While the EHC review covers England and Wales, Energy UK considers that this might be a useful tool for households in Scotland as well.

10. What are your views on our proposal to follow this initial period with mandating action?

Energy UK believes that for the owner-occupier sector, the Scottish Government should focus on encouraging rather than mandating action. However, as set out in our response to question 11, should the Scottish Government decide to go ahead with this proposal, we consider that 2030 may be too late a deadline from which to start mandating action.

11. What are your views on our proposal that 2030 is the right point to start mandating action to achieve EPC Energy Efficiency Rating Band C?

Should the Scottish Government decide that it wants to mandate action in the owner-occupier sector, Energy UK considers that there are risks associated with waiting until 2030 to mandate action for the owner-occupier sector.

While we believe that the Energy Efficient Scotland Programme is a great opportunity for the supply chain to develop over the next two decades, we are concerned about whether it can be scaled up to the level required to deliver the scheme. The deliverability of the scheme is incredibly dependent on the supply chain and will require that the milestones within the programme are spaced out evenly in order to build a viable supply chain. Without an even spread of work across the next two decades, it is likely that there will be significant pressure on the supply chain towards the end of the programme which ultimately risks driving up costs for households. We would, therefore, urge the Scottish Government to carefully consider how it can ensure the deliverability of the scheme across the lifetime of the programme.

12. What are your views on our proposal for owner occupied properties to be subject to penalties for non-compliance?

As a principle, Energy UK believes that if the Scottish Government will be mandating action by households then a robust enforcement framework will need to be in place to ensure compliance. However, we have some doubts about whether penalties will be the right way to encourage action and will certainly present some difficulty in terms of making a positive case for energy efficiency. Rather, we strongly believe that the key lies in getting households on board with the policy and ultimately getting them to ascribe value to energy efficiency.

Energy UK’s long-standing position on how to encourage the uptake of energy efficiency in the able-to-pay market is through a mix of regulatory and fiscal levers as well as the provision for energy efficiency advice for households.

One example of a fiscal lever we consider would be effective is Stamp Duty rebates or in Scotland: Land and Buildings Transaction Tax rebates. Varying the Land and Buildings Transaction Tax, provided it is revenue neutral, could trigger both sellers and buyers to take action and install energy efficiency measures. For example, a buyer could claim a rebate for a percentage of the Land and Buildings Transaction Tax based on EPC improvements installed within one year of purchasing the property. Land and Buildings Transaction tax is paid by the property buyer, but its impact on the total cost of purchasing the property makes it of significant interest to the seller. Alternatively, to encourage sellers to take action, the Land and Building Transaction Tax charge could vary depending on the building’s EPC. The merit
of adjusting the Land and Buildings Transaction Tax in relation to energy efficiency is that it would incentivise demand for energy efficiency amongst home-owners and make its value pronounced and recognisable in the housing market. We would urge the Scottish Government to consider this.

13. What are your views on requiring all types of accommodation to meet the Long-Term Domestic Standard over time? Please explain your answer, giving examples of accommodation you think should not be required to meet the Long-Term Domestic Standard if relevant.

Energy UK strongly welcomes the Scottish Government’s intention that all homes, regardless of type or housing sector should meet the Long-Term Domestic Standard. This will ensure that all households will be able to benefit from improved energy efficiency. However, it will important that the Scottish Government takes a very pragmatic approach when it comes to the different types of accommodation. This will include being clear that the messages to households will need to be tailored differently depending on sector to ensure that that improvements are delivered.

14. Please provide your views on our proposal that all homes with fuel poor households are to reach EPC Energy Efficiency Rating Band C by 2030, where technically feasible and cost effective?

Energy UK strongly welcomes the proposal that all homes with fuel poor households are to reach EPC band C by 2030. This is in line with the UK target and we welcome that the Scottish Government has such a strong focus on energy efficiency as an enduring solution to tackle fuel poverty.

Fuel poor households have notoriously been difficult to target for support and we consider that this will continue to be the case as no definition of fuel poverty will ever be able to encompass all those households who are actually, at risk of, or living in fuel poverty. The Energy Efficient Scotland Programme is a comprehensive programme that will target all housing sectors. This should mean that even those not captured by the new Scottish Government definition of fuel poverty will be able to benefit from energy efficiency improvements. However, if a household in the owner-occupier sector is fuel poor, it is highly unlikely that they will be able to afford to invest in energy efficiency improvements nor will it be appropriate to ask these households to take out loans to fund measures. Energy UK therefore considers that the Scottish Government will need to ensure that grant or other streams of funding are available for these households. In addition to any funding made available by the Scottish Government, some funding will be available for fuel poor households through the Energy Company Obligation (ECO) up until 2022, provided they meet the ECO eligibility criteria. The Scottish Government should ensure that funding and schemes are aligned as much as possible and are able to work together holistically to deliver the best outcomes for consumers.

15. Please provide your views on our proposal that all homes with fuel poor households are to reach EPC Energy Efficiency Rating Band B by 2040, where technically feasible, cost-effective and possible within limits affordable to the public purse?

Please see our response to question 14. In addition, we note that there is a significant lack of detail from the Scottish Government in terms of how it will seek to ensure that homes with fuel poor households will be able to reach EPC band B by 2040. We are also unclear how the Scottish Government intends to check progress on meeting the standard specifically for fuel poor households who can be very difficult to identify and will be living in the different sectors. With this in mind, it seems sensible to primarily focus on the housing stock as opposed to who resides in the properties. If the Scottish Government succeeds in ensuring that all properties meet EPC band C by 2040 this should result in the improvements required for fuel poor households.

The Role of Assessment to Support the Domestic Energy Efficiency Standards

16. In addition to what we have set out in paragraphs 46-50, what should the Energy Efficiency Scotland Assessment Short Life Working Group also consider? Please explain your answer.

Energy UK notes that there is a significant focus on the role of the EPC in helping households/landlords understand which improvements their properties would benefit from. This puts significant pressure on
the EPC assessor to ensure that they get the EPC right. The EPC will highlight a number of measures that could be installed at a property to improve its EPC rating. For the majority of properties those measures will be appropriate. However, some measures come with a greater level of risk attached in terms of the installation process. Work is currently underway to review the PAS2030 standard and develop a new PAS2035 standard at UK level. This work is being carried out to ensure that there is a greater focus on the whole house and getting the design of the measure going into a property right, particularly focusing on the interplay between measures. Given that this work is due to be delivered in the spring of 2019, we would urge the Scottish Government to bear this in mind and set up the Short Life Working Group (SLWG) to have a similar focus. In addition, we consider that there might be a lot of value in having the SLWG look at what advice installers are providing to households/landlords and whether this is of sufficient standard.

Lastly, given the ambitious scope of the Energy Efficient Scotland Programme, the SLWG should also focus on ensuring that consumers have appropriate options for seeking recourse should something go wrong with the installation. Consumer protection should be at the heart of the way the programme is designed. In addition, the Scottish Government should look carefully at the recommendations made in the Each Home Counts Review which was published in December 2016 and is currently being implemented in England and Wales.

Compliance and Enforcement of the Long-Term Domestic Standard

17. What are your views on whether the Long-Term Domestic Standard should be enforced at a local or national level? Please explain your answer?

Energy UK strongly considers that enforcement of the Long-Term Domestic Standard will be key to the programme’s success. We note that there is perhaps a lot of merit in considering a local enforcement strategy given that local authorities will be closer to ground in terms of the energy efficiency improvements being made to properties in their areas. However, should the Scottish Government decide that enforcement should take place at a local level, it is imperative that it ensures that the local authorities have the required resources and expertise to be able to undertake this work. This funding would need to come from the Scottish Government and careful consideration must be given to the ways in which local authorities can be incentivised to carry out this work.

In addition to the potential challenges around local authority resources, Energy UK would also highlight that it will be difficult for those in charge of enforcement to know which properties have been treated and which households/landlords have failed to take action. A solution will need to be found for this to minimise the administrative burden for those tasked with enforcement. One of the recommendations in the Each Home Counts (EHC) Review was for a Data Warehouse to be established that could hold data on which properties have received measures. Energy UK would once again encourage the Scottish Government to look closely at the recommendations made in the EHC Review and engage with the EHC Implementation Board as well as the UK Government to see whether there are any learnings Scotland could adopt.

Non-Domestic Sector Overview

18. Is there specific building characteristic you consider should be included in research to ensure that future improvement targets reflect the diverse nature of our non-domestic building stock? If so, please set out what these are and why they should be considered.

Energy UK considers that others are better placed to respond to this question. However, we would stress that the non-domestic sector has an important role to play in driving energy efficiency and there is huge amount of potential for improvements within the sector. The Scottish Government will need to work closely with the non-domestic sector to ensure that these improvements can be realised. It will, therefore, be important that any awareness raising campaigns on the benefits of energy efficiency which are undertaken in relations to this programme, should targets owners in the domestic and non-domestic sectors.

19. What are your views on the way calculated energy use from building assessments are presented and/or benchmarked? We are particularly interested in what arrangements you favour and how you think they would be useful.
20. What are your views on the proposed planned work to review improvement targets?

Energy UK supports the Scottish Government’s proposed planned work to review the improvement targets. We consider that this is a sensible approach as this provides the Scottish Government with an opportunity to take steps to make changes if it looks like the standard is difficult for non-domestic properties to meet. This could either be through providing additional funding or additional support to businesses.

21. What are your views on our proposals for phasing the regulations from 2020?

We welcome the proposal by the Scottish Government to phase in the regulations from 2020. However, as expressed elsewhere in our response, we have serious concerns about whether the supply chain is ready to deliver such an ambitious programme. The supply chain will need time to adjust, scale up and upskill to be able to deliver the scheme. The Scottish Government should, therefore, carefully examine its different proposals in this consultation and evaluate the impact on the supply chain and its projected availability across the lifespan of the scheme.

22. Should advice and support to invest in the energy efficiency of industrial or manufacturing buildings align with wider advice and support on how to reduce energy consumed for productive processes? If so, please suggest how improving efficiency in building and ‘process’ energy could work together, and what opportunities and challenges this might present?

Energy UK considers that others are better placed to respond.

23. What more could the Scottish Government do to encourage the public sector to accelerate energy efficiency across their building stock?

Energy UK considers that others are better placed to respond.

24. What more could the Scottish Government do to encourage the public sector to accelerate heat decarbonisation across their building stock?

Energy UK considers that others are better placed to respond.

The Programme and use of EPC Data (Domestic and Non-Domestic)

25. What additional data would help building owners in the delivery of the Energy Efficient Scotland Programme? How would this be used?

In addition to the comments we made in relation to question 9, Energy UK would highlight the following data as potentially being helpful to households.

The success of the Energy Efficient Scotland Programme will very much depend on whether the Scottish Government is successful in getting households and landlords to ascribe value to energy efficiency. This will require that the Scottish Government identify more opportunities where an EPC and the improvements recommended are highlighted to households. In Denmark, when a property is on the market, the advert for the house will outline the projected cost of ownership (i.e. running costs/heating and energy costs) and the EPC rating will be clearly displayed. Energy UK would suggest to the Scottish Government that introducing such a requirement might be helpful. Something similar might be possible for the rented sector.

To ensure that the Energy Efficient Scotland Programme can be delivered, the Scottish Government will need to make sure that the advice provided to households is fit for purpose and works in practice. Furthermore, it is imperative that the advice is suitably independent so that consumers will be able to trust that they are getting the right advice and support as they look to undertake energy efficiency improvements.

26. What additional data would be helpful to others in the delivery of the Energy Efficient Scotland Programme? How would this be used?
Energy UK would urge the Scottish Government to make use of the powers contained within the Digital Economy Act which allow for the sharing of data with energy companies and wider stakeholders for the purposes of tackling fuel poverty. Data sharing is a great opportunity for stakeholders to help target support for fuel poor households and should ultimately help the Scottish Government deliver its ambitious Energy Efficient Scotland Programme.

27. We will investigate the benefit in providing new online resources or tools to support building owners to access and use data to help them improve their properties. What particular types of resources or tools would you find useful and why?

Please see our response to question 9. We further highlight that any new online resource should perhaps look at where consumers can go for independent quotes and to obtain information about high quality installers.

We further note that provisions will need to be put in place for households who are not able to get online to access the information. Availability of advice to households will be important for all households not just those who are able to use the internet.

28. In addition to the above, we welcome any specific comments or observations you may have on the future use of the data that is gathered from energy assessments.

Energy UK would suggest that the Scottish Government should engage with the Each Home Counts Review to learn about its plans for implementing the recommendation around the Data Warehouse as referenced in our response to question 17. If this data could be shared through the Data Warehouse this could be useful in terms of the deliverability of the wider Energy Efficiency Scotland Programme.

29. What are your views on the implementation and enforcement of existing legislation relating to energy efficiency and heating of building in Scotland.

Energy UK would strongly urge the Scottish Government to ensure that the standards framework it puts in place to underpin its Energy Efficiency Scotland Programme is consistent with that of the rest of the UK. As mentioned elsewhere in our response to this consultation, Energy UK would advise that the Scottish Government looks at the work of the Each Home Counts (EHC) review. The review was commissioned by the UK Government to look at ways to address issues around a lack of consumer protection and how to improve quality in the energy efficiency and renewable energy sector. Without a robust quality and standards framework in place there is a risk that the Energy Efficient Scotland Programme will not deliver the outcomes the Scottish Government is hoping for. That the Scottish Government carefully considers and takes steps to get this right will, therefore, be critical.

30. What changes may be needed (if any) to this existing legislation to ensure that the Scottish Government, local authorities, and any other relevant bodies or persons, have the powers and duties necessary to support the Energy Efficient Scotland Programme?

As highlighted elsewhere in our response, Energy UK considers that data sharing will be vital to the success of the Programme and further consider that the Scottish Government should engage with the Each Home Counts Review on the development of the Data Warehouse.

31. What other elements of the Programme may require new or amended legislation to enable the Energy Efficient Scotland Programme to operate?

Energy UK considers that other are better placed to respond to this question.

32. Which organisation(s) should be responsible for delivering any new legal requirements?

Energy UK considers that others are better placed to respond to this question.

For further information or to discuss our response in more detail please contact Cecilie Ingversen on 020 7747 2969 or at cecilie.ingversen@energy-uk.org.uk.