

Number: **WG-17477**



Llywodraeth Cymru
Welsh Government

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Consultation Document

Building Regulations &c. (Amendment) (Wales) Regulations 2013

Regulatory Impact Assessment

Date of issue: **23 January 2013**

Responses by: 20 February 2013

Overview

This is a consultation on the draft Building Regulations &c. (Amendment) (Wales) Regulations 2013 ("the draft regulations"). The draft regulations introduce changes in Wales through amendments to the Building Regulations 2010 ("the building regulations") and through the Building (Approved Inspector etc) Regulations 2010 ("the approved inspector regulations"). In broad terms, the amendments implement elements of the EU Directive 2010/31/EU ("the Directive") on the energy performance of buildings, facilitate the Green Deal, amend provisions providing for completion certificates and update schedule 3 of the building regulations which provides for self-certification (competent person) schemes.

Section 14(7) of the Building Act 1984 requires the Welsh Ministers to consult the Building Regulations Advisory Committee for Wales (BRACW) and such other such bodies as appear to them to be representative of the interests concerned before making building regulations that contain substantive requirements.

This consultation seeks your views on the how the draft regulations transpose elements of the Directive in Wales. We are required by law to implement the Directive and so do not seek your views on whether or not the Directive should be implemented. This consultation also seeks your views on how the draft regulations facilitate the Green Deal in Wales. The Green Deal is a UK Government environmental initiative that provides opportunities for business in Wales and we do not seek your views on whether or not the Welsh Government should facilitate the Green Deal in Wales.

The draft regulations are based on regulations already made in England which are titled "The Building Regulations &c. (Amendment) Regulations 2012" S.I.2012/3119 ("England's regulations"). The amendments made by the draft regulations have already been the subject of consultation in England.

England's regulations can be found at the legislation.gov.uk website.

A further set of regulations made in England which are titled "The Energy Performance of Buildings (England and Wales) Regulations 2012" S.I. 2012/3118 transpose, in England and Wales, elements of the Directive which are not the subject of this consultation. These regulations can be found at the legislation.gov.uk website

The Directive can be found at the eur-lex.europa.eu website

The proposed amendments to schedule 3 are subject to a separate consultation with BRACW, the Competent Persons Forum and LABC and are reproduced for information only.

How to respond

Consultees are invited to email responses to: enquiries.brconstruction@wales.gsi.gov.uk

Those who prefer to submit a paper copy of their response should send these to:

Building Regulations Consultation
Construction Unit
Environment and Sustainable Development Directorate
Welsh Government
Rhyd y Car Offices
Merthyr Tydfil
CF48 1UZ

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact Details

For further information:

Construction Unit
Welsh Government
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CF48 1UZ

Telephone: 0300 062 8141

E-mail: enquiries.brconstruction@wales.gsi.gov.uk

Data Protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

DRAFT REGULATORY IMPACT ASSESSMENT

1. Building Regulations &c. (Amendment) (Wales) Regulations 2013: Introduction

Title: Building Regulations &c. (Amendment) (Wales) Regulations 2013	Regulatory Impact Assessment (IA)
	Date: January 2013 Stage: Final Source of intervention: EU Type of measure: Secondary Legislation Contact for enquiries: Francois Samuel E-mail: francois.samuel@wales.gsi.gov.uk Tel: 0300 062 8232

This is a Regulatory Impact Assessment to accompany the draft Building Regulations &c. (Amendment) (Wales) Regulations 2013.

The amendment regulations cover a number of separate policy issues which require amendments to secondary legislation. These amendments seek to:

- a. implement the requirements of Directive 2010/31/EU on the energy performance of buildings (recast);
- b. amendments to facilitate the Green Deal, including provisions providing for completion certificates; and
- c. amend and update Schedule 3 of the building regulations which provides for self-certification (competent person) schemes.

The Regulatory Impact Assessment for the implementation of Directive 2010/31/EU is set-out at part 2, below.

The Welsh Government has not prepared a Regulatory Impact Assessment in relation to the Green Deal amendments or the amendments to update Schedule 3.

The UK Government's Department for Energy and Climate Change have prepared a UK final Impact Assessment covering the Green Deal (DECC IA), attached at **Annex A**. The DECC IA covers the establishment of the Green Deal including regulatory changes. As such, the proposed amendments which facilitate the Green Deal do not require a further Regulatory Impact Assessment.

In relation to the issuing of completion certificates in all instances, where the local authority has ascertained that work is compliant, it is our view that there is no additional measureable cost to the local authority when issuing a completion certificate as it is part of the existing administration costs incurred when dealing with building regulations applications. There is likely to be a minimal transitional cost to building control bodies and competent person schemes in making the proposed changes to the certificates, however, as these amendments have been introduced in England, these changes have already been made. Therefore, the subsequent implementation of these changes in Wales will have no additional costs.

In respect of the amendments to update Schedule 3 of the building regulations 2010 (self certification schemes) to facilitate the Green Deal, it is the Welsh Governments view that the Regulatory Impact Assessments completed by the UK Government's Department for Communities and Local Government IA (DCLG IA) is representative of the costs in Wales as the majority of the costs identified in the DCLG IA fall to scheme operators and the competent

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persons schemes operate on an England and Wales basis and do not currently provide separate Wales data.

The DCLG IA shows a net annual benefit to business of £32.2m (2009 prices), this is due to the deregulatory nature of these changes. The DCLG IA, attached at **Annex B**, was completed to accompany the English Building Regulations &c. (Amendment) Regulations 2012. However, information on scheme membership is currently only available on an England and Wales basis. Therefore we have not been able to disaggregate the costs. The majority of the costs identified in the DCLG IA fall to scheme operators, none of whom are based in Wales. The cost to scheme members relates to the need to maintain and update knowledge and training which, will apply equally to any businesses operating in Wales. Scheme operators have agreed to collect and provide data on members in Wales from April 2013.

Failure to extend the schemes in Wales would result in separate schemes operating in England and Wales. This is likely to generate additional costs with scheme operators having to administer and monitor separate schemes and businesses, operating in both England and Wales, having to join and meet the requirements of two separate schemes. The failure to make these changes would result in businesses, individuals and local authorities not being able to take advantage of the Green Deal. This could have potential detrimental effect on businesses in Wales.

In respect of the update to Schedule 3 of the building regulations (self certification schemes) in relation to the change of names and scope, these are technical changes made to reflect legal name changes and the current position on authorisation of schemes and there are no costs or net benefit to business, no impact assessment will be required or prepared in respect of these changes.

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2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

Title: Building Regulations &c. (Amendment) (Wales) Regulations 2013: Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)	Regulatory Impact Assessment (IA)
	Date: January 2013 Stage: Final Source of intervention: EU Type of measure: Secondary Legislation Contact for enquiries: Francois Samuel E-mail: francois.samuel@wales.gsi.gov.uk Tel: 0300 062 8232

Summary: Intervention and Options

What is the problem under consideration? Why is government intervention necessary?

The Recast of the Energy Performance of Buildings Directive is an EU measure that must be implemented by 9 January 2013. It builds on the existing Energy Performance of Buildings Directive and is designed to reduce carbon emissions from buildings and increase their energy efficiency. The Recast complements the 2008 Climate Change Act which requires a reduction in carbon emissions by 80% on 1990 levels by 2050. Emissions from buildings account for 40 - 45% of all CO₂ emissions in the UK. Therefore, it is particularly important that carbon emissions from existing buildings are reduced by making them more energy efficient, and that new buildings are designed and built with high levels of energy efficiency.

What are the policy objectives and the intended effects?

The policy objective is to implement the recast and in doing so, improve the energy efficiency of buildings and thus reduce CO₂ emissions and lessen the impact of climate change. Implementation of the Directive would also avoid infractions proceedings, fines and reputational risk to the Government.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

The following options were considered:

- (1) fully implement the requirements of the Directive
- (2) do nothing, ie do not implement the Directive.

All costs and benefits have been calculated against a baseline of zero.

Option 1 is our chosen option. As this is an EU Directive, option 2 is not tenable

Will the policy be reviewed? It will be reviewed. If applicable, set review date: 2018

Does implementation go beyond minimum EU requirements?			No		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	Micro Yes	< 20 Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)					

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2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

Summary: Analysis & Evidence Policy Option 1

Description: Fully implement the requirements of the Directive

FULL ECONOMIC ASSESSMENT

Price Base Year 2012	PV Base Year 2012	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -3.43	High: -1.03	Best Estimate: -2.23

COSTS (£m)	Total Transition (Constant Price) Y		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low			0.1	1.0
High			0.4	3.4
Best Estimate	0		0.3	2.2

Description and scale of key monetised costs by 'main affected groups'

There will be a one-off cost to the public sector of £10k. Average annual costs will be £2.50k for the public sector. Average annual costs to businesses will be £256k .

Other key non-monetised costs by 'main affected groups'

None.

BENEFITS (£m)	Total Transition (Constant Price) Y		Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low			0.0	0.0
High			0.0	0.0
Best Estimate			0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

It is not possible to quantify, some benefits may derive from decisions made following consideration of alternative energy systems where these reduce future running costs, these will depend on decisions made by individual building owners

Other key non-monetised benefits by 'main affected groups'

None

Key assumptions/sensitivities/risks

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			
Costs: 0.2	Benefits: 0.0	Net: -0.2	

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2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

Subject

Implementation of Directive 2010/31/EU on the Energy Performance of Buildings Directive (recast).

Background

Directive 2002/91/EC on the Energy Performance of Buildings came into force on 4 January 2003. The objective of the Directive is to promote improvement of the energy performance of buildings and to reduce the amount of carbon they produce.

Implementation of the Directive in England and Wales has been taken forward primarily through Building Regulations (England and Wales) and Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations made through the European Communities Act 1972.

Requirements of the Directive included:

- to establish methodologies for calculating the integrated energy performance of buildings;
- the application of minimum energy standards
- an Energy Performance Certificate (EPC) be provided by the building owner for all buildings when they are built, sold or rented out;
- the display of an EPC in large public buildings, over 1,000 m² ;
- regular inspections of, and recommendations about improving, the energy performance of Air Conditioning installations over 12 kW;
- the regular inspection of boilers above a certain size or the provision of advice to users.

Responsibility for transposition for England and Wales rested with the UK Government

As of January 1st 2012 Welsh Ministers have assumed functions under the Building Act 1984 including responsibility for making Building Regulations. All Member States are required to comply with the Directive, whilst the UK Government is the member state Welsh Ministers are responsible for transposing devolved aspects i.e. those elements of the Recast which relate to Building Regulations

The Recast

Directive 2010/31/EU was published on 19 May 2010. The recast has extends, strengthens and clarifies provisions contained within the original Directive.

The main aspects of the recast to be addressed through Building Regulations in Wales and related National Calculation Methodologies (SAP/SBEM) are as follows:

- minimum energy performance requirements set for buildings, building units or building elements are to be set with a view to achieving at least

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2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

- cost-optimal levels, with these levels calculated in accordance with the comparative methodology framework published by Europe;
- Energy use of technical building systems (heating, hot water, air-conditioning and large ventilation systems) to be optimised by setting requirements for overall energy performance, installation, sizing, commissioning and control of systems;
- Analysis of alternative high efficiency systems to be carried out for new buildings prior to construction;
- from 2021, all new buildings to be nearly zero energy buildings, with an earlier target date of 2019 for new buildings owned and occupied by a public authority;
- Member States to take measures to stimulate the transformation of buildings that are refurbished into nearly zero-energy buildings;

Rationale for Government intervention

As a European Directive, implementation, through regulation by Member States, is mandatory. Accordingly, the Welsh Government has developed proposals in response to the requirements identified within the recast Directive. Failure to implement a directive will lead to infraction proceedings.

Transposition in Wales

The Directive provides that Member States shall:

- adopt and publish the laws and administrative provisions necessary to comply with articles by 9 July 2012 at the latest; and
 - apply provisions relating to articles 4 to 8 and 14 to 16 to buildings occupied by a public authority by 9 January 2013 at the latest and to other buildings by 9 July 2013.
1. The following articles within the Directive introduce new or changed requirements to the original directive which the draft regulations at Appendix A are intended to transpose in respect of Wales:
 - Article 1 describes the purpose of the Directive and explains its requirements.
 - Article 2 provides a number of definitions which differ from or are additional to definitions within domestic legislation;
 - Article 4 provides for the setting of minimum energy performance requirements for buildings at a cost-optimal level and provides a number of exemptions as well as removing an exemption for monuments from the previous Directive (the majority of Article 4 were transposed as part of the original Directive);
 - Article 5 requires calculation of cost optimal levels of minimum energy performance requirements
 - Article 6 provides for all new buildings to consider alternative systems prior to construction and for an analysis to be available to local authorities;

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2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

- Article 7 provides for improvements to energy performance of existing buildings undergoing major renovation and for retrofit of building elements as far as is technically, functionally and economically feasible. These measures are already covered as guidance in the Approved Documents Part L but the Directive requires these to be transposed into law;
- Article 8 provides that system requirements shall be set for the installation, dimensioning, and adjustment and control of technical building systems that are installed in existing buildings, in order to optimise their energy use.
- Article 9 provides for nearly zero energy buildings by 31 December 2020 for all new buildings and by 31 December 2018 for new buildings occupied by public authorities

Remaining elements of the recast relating to EPCs, DEC, inspections and reporting will be transposed by UK Government on an England and Wales basis

Impacts of proposed regulatory changes in Wales

Many of the requirements of the directive are already implemented in Building Regulations in practice as they are covered by the guidance in the Approved Documents, where the requirements are covered by Approved Document guidance; the Directive requires that these be mirrored in regulations. Some definitional changes are required, these have no cost impact. Some savings will flow from the extending exemption from EPCs for places of worship, historic and temporary buildings.

Article 1 – subject matter

This Article describes the purpose of the Directive and explains its requirements. **It does not impose any increased costs or burdens on Business, the consumer or the Welsh Government.**

Article 2 – definitions

This Article defines a number of terms that are used in the Directive. **It does not impose any increased costs or burdens on Business, the consumer or the Welsh Government.**

Article 3 – adoption of a methodology for calculating the energy performance of a building

This Article provides that Member States shall apply a methodology for calculating the energy performance of buildings in accordance with the common general framework set out in Annex 1 of the Directive. The aspects that must be taken into account by the methodology required for the Recast are virtually the same as for the existing Directive.

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The UK Government is responsible for approving the methodology for England and Wales under regulation 24 of the Building Regulations 2010. The only difference is a requirement to include a numeric indicator of primary energy use on Energy Performance Certificates and Display Energy Certificates. A numeric indicator of primary energy use is already calculated by the software used to assess the energy performance of buildings in England & Wales. All that needs to be done to comply with this Article is to include that data on energy certificates. This is a very minor change with a de minimis cost to UK Government. The likely cost is so small that it is not possible to quantify it. **Therefore, this Article does not impose any increased costs or burdens on business, consumers, or Government.**

Article 4 – setting of minimum energy performance requirements

Article 4 requires Member States to ensure that the minimum energy performance requirements for buildings referred to in Article 3 are set with a view to achieving cost-optimal levels of performance. Minimum energy performance requirements are set in Building Regulations, for which separate Impact Assessments are prepared. The Welsh Government consulted in 2012 on proposals for minimum energy performance requirements (Part L consultation stage Impact Assessment <http://wales.gov.uk/consultations/planning/buildingregspartl/?lang=en>). No decisions have yet been taken on those proposals. The cost of doing this is considered further in relation to Article 5.

Article 5 – calculation of cost optimal levels of minimum energy performance requirements

Article 5 provides that the Commission shall establish by 30 June 2011 a comparative methodology framework for calculating cost-optimal levels of minimum energy performance requirements for buildings and building elements. The Commission did not in fact produce a framework by that date. The framework was finally published on 21 March 2012. The purpose of the comparative methodology framework is to enable Member States to calculate minimum energy performance requirements at levels that are cost-optimal and enable comparisons to be made between the relative performance of Member States. **This Article does not impose any increased costs or burdens on business or consumers.**

It will result in a modest one-off cost to the Welsh Government of up to £10k as a contribution to work being undertaken by the UK Government in respect of England. This is explained in more detail below.

Cost-optimal methodology

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Cost-optimality involves a far more precise calculation of costs and benefits than cost-effectiveness. Minimum energy performance requirements are cost-optimal when the cost of investment maximises the value of any benefits that will result. Further investment may deliver additional benefits but only at a cost which exceeds investment. A lower level of investment would result in a disproportionate decrease in benefits.

The cost-optimal methodology will not replace existing national methodologies currently used to calculate minimum energy performance requirements. It will sit alongside them and be used to compare the relative performance of Member States.

The framework will require Member States to:

- define reference buildings that are representative of their building stock in terms of functionality, geographic location and climate conditions;
- define energy efficiency measures to be assessed for the reference buildings;
- assess the final and primary energy need of these reference buildings, calculated in accordance with relevant European standards; and
- calculate the costs of the energy efficiency measures during the expected economic lifecycle of the reference buildings.

Member States are required to report to the Commission all input data and assumptions used in those calculations and the results of the calculations. The first report is to be submitted by 30 June 2012 and at least every five years thereafter. As noted above, the Commission were late in establishing the cost-optimal methodology framework. As a result, the deadline for Member States to submit a report has been put back until 21 March 2013.

In England & Wales, we already:

- define representative reference buildings;
- define energy efficiency measures to be assessed for those buildings;
- assess the final and primary energy needs of those buildings.

Therefore, the only new requirement will be to calculate the costs of the energy efficiency measures for each of the representative reference buildings with a view to achieving cost-optimal levels of performance.

This will be a one-off calculation with further calculations only required when changes are made to the national methodologies. Amendments to the national standards are generally made about every 4 years.

The UK Government has awarded a contract to carry out this work. Welsh Government may contribute towards this work, whilst the need for separate

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welsh work has yet to be identified a modest contribution of up to £10k has been estimated. This will be a cost to the Welsh Government.

Any future calculations of the costs of the energy efficiency measures for each of the representative reference buildings, which will only be needed whenever the standards are updated, are likely to cost less with estimated annual recurring costs to the Welsh Government of about £2,500. This figure is based on a contractor spending about 10 days on the work every four years with a day rate of £1,000.

This expenditure will not result in any net benefit to Government. However, benefits will accrue to the construction industry and their clients as the cost-optimal methodology will enable an assessment to be made of the level of investment in energy efficiency improvements that will deliver the maximum level of benefits at the lowest cost. **It is not possible to quantify those benefits because of the size and very diverse nature of the construction industry.**

Article 6 – New Buildings

Under Article 6 the Directive now requires that before construction starts the technical, environmental and economic feasibility of high-efficiency alternative systems must be considered and the consideration verified. Such systems may include decentralised renewable energy supply, cogeneration, district or block heating or cooling, or heat pumps. The analysis of alternative systems may be carried out for individual buildings, for groups of similar buildings, or for common typologies of buildings in the same area.

It is proposed to include, as an additional output from the national calculation methodology, a facility for the builder to declare that an analysis of high energy alternative systems has been carried out and documented before work starts and where this analysis will therefore be available for verification purposes. This work is being led by the UK Government.

It is not proposed that a specific methodology be adopted e.g. BREEAM Low and Zero Carbon Technologies report.

(The draft regulations will also amend Building Regulations to require the evidence of the consideration to be submitted to the building control body along with other energy efficiency calculation information already required to be submitted before construction starts.)

There is no obligation to adopt any of those systems, just to consider them

In England & Wales, an analysis of alternative systems is already undertaken in respect of buildings larger than 1,000m². The analysis is of common typologies of buildings in the same area. In future, this analysis will be extended to all new buildings, regardless of size. In addition, the analysis will need to be documented and retained for verification purposes.

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So, the only changes introduced by this Article are:

- the analysis of alternative building systems to be carried out for all new building developments smaller than 1,000m²;
- the analysis in every case must be documented; and
- the documents retained for verification purposes by local authority building control.

If collective heating or cooling systems are being considered, the analysis may be carried out for all buildings connected to the system in the same area.

In order to comply with BREEAM and Code for Sustainable Homes national planning policy and Welsh Government funding requirements new building developments may already go through this procedure as part of the design process.

Is anticipated that consideration of alternative systems will usually be undertaken by building services engineers thought for smaller projects it may fall within the capability of an Architect.

For dwellings, the amount of work will vary dependant on the typologies and technology options considered however it should be noted that:

- The Recast does not require that any of the options considered are taken forward – merely that there is evidence they have been considered, so this is a very light-touch system which will not involve much additional work;
- Part L already sets challenging energy standards for new buildings. This requires designers to consider the range of options available to them in order to ensure that they deliver a solution which meets the expectations of the building developer and Part L requirements. Those options would include decentralised renewable sources, district/block heating, combined heat and power, and heat pumps;
- The new requirement is not onerous; it simply requires designers to formally record a brief summary of the process they will have to go through anyway to meet Part L requirements and their client's expectations.

This approach is also supported by the English and Scottish governments.

Estimated costs range from £200 per development for large housebuilders with in-house capability utilising standards housetypes to £500 where external consultants are employed. On average we assume there will be two typologies per development for new housing.

Data on the number of new housing developments per year in Wales has been provided by the National House Building Council. For the years 2007-11 the average number of new housing developments per year is approximately

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246 (range 200-407) comprising an average of 4300 (range 3300-7400) new housing units which suggests an average of 17 housing units per development.

NHBC are quoted as having 80% share of the new housing market which would put estimated total annual sites at 310.

Low scenario

Based on an assessment of 2 No. typologies per development site the total cost is £200 per development (meaning all will be built by major house-builders). This equates to £62,000 annual cost

High scenario

Based on the same number of developments and units as above but raising to 3 the number of typologies to be studied by major housebuilders and requiring assessment of more energy technologies (assumes 6 No. tripling the previous £200 cost to £600) for 80% of development (approximate proportion of dwellings built by major housebuilders). It is assumed 20% of development delivered by SMEs is assessed by consulting engineers for 2 No. typologies with few energy technology options for minimum LZC fee (e.g. £500). The calculation is as follows:

$(310 \times 0.2) \times 500 + (310 \times 0.8) \times 600 = £178,800$ annual cost

On the non-domestic side, the source of data used is The English Building Research Establishment non-domestic stock model as modified for the Welsh Government consultation on changes to Part L (<http://wales.gov.uk/consultations/planning/buildingregspartl/;jsessionid=FB560F0A6B155DCD2542E50A0DC143D2?lang=en>).

The table below shows the actual planning data from three historic years, 1997, 2006 and 2008, together with the original BRE projected data for the years 2013 to 2022 and figures as revised by AECOM consultants.

Table 1: Planning data on build-mix in Wales

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Table 1: Planning data on build-mix in Wales

	Planning data, 1997	Planning data, 2006	Planning data, 2008	Previous BRE forward projection	AECOM proposed revised forward projection	
	'000m ²	'000m ²	'000m ²	'000m ²	'000m ²	% build-mix
Education	28	22	90	41	32	7%
Healthcare	22	20	18	8	19	4%
Hotels	45	17	29	10	28	6%
Offices	42	27	42	23	33	7%
Retail	55	587	94	73	179	37%
Warehouses and industrial	287	113	340	90 (not including industrial)	174	36%
Residential Care	13	22	12	11	15	3%
			Total	256	482	100%

The difficulty lies in establishing how the floor space is distributed between buildings. The predicted proportion of buildings <1000m² is unclear

Developments in Wales exceeding 1000m² are subject to the national planning policy to achieve BREEAM Very Good. It is likely that they will undertake a low zero carbon study as part of the process. Article 6 should not therefore result in additional costs. This is also likely to be the case with public sector buildings under 1000m² funded by Welsh Government where a condition of funding is to achieve the BREEAM Very Good standard. It is also likely that other public sector buildings are subject to individual organisation policies committing to achieving environmental standards (such as BREEAM). Key to cost therefore is establishing the relative numbers of predicted development above and below the 1,000m² threshold and the proportion (<1,000m²) that is public sector.

Assuming the number of new non-domestic buildings remains approximately static from 2011 levels (approximately 180 buildings in total based on work undertaken by AECOM and Welsh Government as part of Part L consultation modelling), 2 scenarios have been developed (italicised column is the element which requires additional assessment to meet the Directive Article 6 requirements).

Cost Scenarios	Total Buildings	<1,000m ²		>1,000m ²	
		Private Sector	Public Sector	Private Sector	Public Sector
Low	180	10% (18)	15% (27)	70% (126)	5% (9)
High	180	40% (72)	10% (18)	40% (72)	10% (18)

Low scenario

Assumes additional costs will fall on 10% (18) of developments. Based on consulting engineer rates for assessing a non-domestic building for potential to generate low and zero carbon from all building integrated and decentralised

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energy technologies (approximately £3,000) the total annual cost would be £54,000.

High scenario

This scenario is based on consulting engineer rates for assessing 72 No. non-domestic buildings for potential to generate low and zero carbon from all building integrated and decentralised energy technologies. The annual cost is £216,000

The total cost to business for both domestic and non-domestic buildings per year would therefore range between £116,000 and £395,000

Article 7 – existing buildings

Article 7 provides that when an existing building undergoes a major renovation, at least one of the following must be upgraded in order to the meet the minimum energy performance requirements set under Article 4 in so far as it would be technically, functionally and economically feasible to do so. The:

- building as a whole and/or;
- renovated part of the building; and/or
- renovated building element.

This Article does not impose any increased costs or burdens on business, consumers or the Welsh Government.

Existing provisions in the Building Regulations 2010 (Regulation 23) are sufficiently wide to meet the requirement in the Recast that when a building undergoes a major renovation, the renovated building element must be upgraded in order to the meet the minimum energy performance requirements set under Article 4. Therefore, further changes to the domestic legislation to comply with this Article are unnecessary. The Regulations refer to “thermal element” rather than “building element” but for the purposes of the Regulations, the two terms have the same meaning.

Article 8 – technical building systems

This Article provides that system requirements shall be set for the installation, dimensioning, and adjustment and control of technical building systems that are installed in existing buildings, in order to optimise their energy use. **This Article does not impose any increased costs or burdens on business, consumers or the Welsh Government.**

The provisions of this Article are already a requirement in England & Wales through Regulation 44 of the Building Regulations which requires the

DRAFT REGULATORY IMPACT ASSESSMENT

2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

commissioning of fixed building services. Further changes to the Building Regulations to comply with these provisions are unnecessary.

Article 9 – Nearly zero energy buildings

Article 9 requires Member States to ensure that:

- after 31 December 2018, all new buildings that are occupied and owned by a public authority, are nearly zero-energy buildings; and
- by 31 December 2020, all other new buildings are nearly zero-energy buildings.

A **nearly zero energy building** is defined as meaning “a building that has a very high energy performance..... The nearly zero or very low amount of energy required should be covered to a very significant extent by energy from renewable sources produced on-site or nearby”.

In stating that that the energy required should be covered to a very significant extent from renewables, the Commission are not imposing an obligation on Member States to ensure this happens. In this context, the word ‘should’ is an aspirational or permissive term which means that where possible and subject to economic and other considerations, developers are encouraged to use renewables as the main source of energy supply in new buildings. It does not mean that the main source of energy must come from renewables.

The Recast provides that Member States may decide not to apply these requirements in specific and justifiable cases where the cost-benefit analysis over the economic lifecycle of the building in question is negative.

The requirement in respect of new buildings occupied and owned by a public authority means that any such buildings which obtain planning permission 1 January 2019 will be required to meet the definition of nearly-zero energy buildings. Similarly, all other new buildings that obtain planning permission from 1 January 2021 will be required to meet the definition.

The Directive does not specify very high energy performance but sets out a process for doing so (Annex 1 of the Recast of the Energy Performance of Buildings Directive). **Similarly to the approach for minimum energy performance requirements in Article 4, any specification of high energy performance will be set out in Building Regulations and subject to separate Impact Assessments.**

Specific Impact tests

Economic and financial impacts

DRAFT REGULATORY IMPACT ASSESSMENT

2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

Competition

A Competition Assessment has not been completed because the requirements will affect all sectors equally.

Small Medium Enterprises

Small Firms may benefit from the reporting of consideration of alternative energy systems (Article 6) as many of the professions likely to undertake the work are small companies otherwise there will not be a particular impact on SMEs

Social Impacts

Health & Well-being

The regulatory changes are not expected to result in specific health and well being impacts.

Equalities

Race equality, disability equality, gender equality and Human Rights: The Recast is concerned with buildings, not people. It will affect all occupiers equally

Welsh Language

There are no significant links between the policy proposals and the Welsh language. The regulatory changes are not expected to have a positive impact on the promotion, support or development of the Welsh language nor are they expected to have a negative impact on Welsh speaking communities or Welsh language services.

Environmental Impacts

Greenhouse Gas Emissions

The impact of the regulatory changes are generally supportive of policies to reduce carbon emissions.

Wider Environmental Impacts

The regulatory changes are not expected to result in wider environmental impacts. The changes are not expected to have any impact on water quality or quantity, biodiversity, waste

Sustainable Development

The Recast is designed to reduce carbon emissions and thereby promote sustainable improvement. It is not possible to assess the likely amount of carbon that will be saved as that is dependent on building owners decisions in relation to alternative energy systems considered.

DRAFT REGULATORY IMPACT ASSESSMENT

2. Directive 2010/31/EU on the Energy Performance of Buildings Directive (Recast)

Rural

Rural proofing: The recast does not relate to specific geographical areas.

DRAFT REGULATORY IMPACT ASSESSMENT

Annex A – Department for Energy and Climate Change, Final Stage Impact Assessment for the Green Deal and Energy Company Obligation

Title: Final Stage Impact Assessment for the Green Deal and Energy Company Obligation IA No: DECC0072 Lead department or agency: DECC Other departments or agencies:	Impact Assessment (IA)			
	Date: 11/06/2012			
	Stage: Final			
	Source of intervention: Domestic			
	Type of measure: Secondary legislation			
Contact for enquiries: Chris Nicholls 0300 068 6017				
Summary: Intervention and Options				RPC: AMBER

Cost of Preferred Option				
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB in 2009 prices)	In scope of One-In, One-Out?	Measure qualifies as
£8.3bn	-£11.0bn	£1.3bn	Yes	IN

What is the problem under consideration? Why is government intervention necessary?

Improvements to the UK's energy efficiency will reduce Greenhouse Gas emissions, improve energy security, mitigate fuel poverty, increase productivity and reduce the costs of meeting the UK's renewable energy target. Government intervention is justified to address market failures and barriers slowing take-up of socially cost-effective energy efficiency measures. These include access to capital and discount rates, information asymmetry, positive innovation externalities, inertia, and incentive incompatibility. Intervention is also justified to help achieve the Government's distributional objectives.

What are the policy objectives and the intended effects?


The Green Deal and the Energy Company Obligation (ECO) are complementary policy mechanisms which will address market failures and barriers and hence drive demand for cost-effective energy efficiency measures. The Green Deal aims to overcome access to capital, mismatched incentive problems and provide a trustworthy framework of advice, assurance and accreditation for the energy efficiency supply chain. The ECO aims to provide additional support to deliver measures that are part of a cost-effective strategy for achieving the UK's carbon targets but which will not be fully financeable through the Green Deal, and provides subsidised measures to low income and vulnerable households to relieve fuel poverty.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

The options considered were: continuing with the existing carbon emissions reduction targets (CERT); adopting the Green Deal with and without ECO targets (set at different levels, which would require different estimated levels of spend to deliver) accompanied by regulating the private rental sector's energy efficiency; or having no policies in place that encourage uptake of energy efficiency in the built environment. The preferred option is the Green Deal accompanied by ECO targets for suppliers, and regulations in the private rental sector. The reason is to encourage the uptake of more costly energy efficiency measures with longer payback rates than those currently delivered under CERT, in order to meet the country's future carbon budgets. The combination of these policies enables a more market-focussed approach to delivering these measures, where competition amongst Green Deal providers is likely to drive take-up beyond the levels expected under CERT or the option of no policies.

Will the policy be reviewed? It will be reviewed. If applicable, set review date: 10 / 2015					
Does implementation go beyond minimum EU requirements?			N/A		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	Micro Yes	< 20 Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded: -44	Non-traded: -84	

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.



Signed by the responsible Minister: _____ Date: 08/06/2012

Summary: Analysis & Evidence

Preferred Policy Option

Description: Chosen option

Price base year 2011	PV Base Year 2012	Time Period 10 years	Net Benefit (Present Value (PV)) (£m)		
			Low: £6.3bn	High: £9.0bn	Best Estimate: £8.3bn

COSTS (£m)	Total Transition (Constant Price)	Year	Average Annual (excl. Transition) (Constant)	Total Cost (Present Value)
Low	Optional		Optional	£14.9bn
High	Optional		Optional	£18.8bn
Best Estimate				£17.3bn

Description and scale of key monetised costs by 'main affected groups'

The majority of the costs of the Green Deal will be borne by the beneficiaries of the energy efficiency measures (some or all of the costs of installing and financing energy efficiency measures and the costs of the Green Deal framework of advice, assurance and accreditation). These costs are estimated at £14.9bn to £18.8bn. The cost of meeting the ECO, administering the scheme and running the billing system will fall on energy companies, who are expected to pass on these costs to energy consumers.

Other key non-monetised costs by 'main affected groups'

The installation of energy efficiency measures may have adverse impacts on householder health in a small number of cases. Job losses from parts of the cavity and loft insulation market are likely. These costs have not been monetised.

BENEFITS (£m)	Total Transition (Constant Price)	Year	Average Annual (excl. Transition) (Constant)	Total Benefit (Present Value)
Low	Optional		Optional	£21.2bn
High	Optional		Optional	£27.8bn
Best Estimate				£25.6bn

Description and scale of key monetised benefits by 'main affected groups'

The main groups benefiting from the policy package will be those taking out Green Deals, those occupying properties with Green Deal plans, and those receiving support from the ECO. These groups will benefit from the energy savings (ranging from £12.7bn to £16.2bn) and from additional comfort (ranging from £2.8bn to £3.7bn). There are also benefits to wider society from improved air quality (£1.2bn to £1.6bn), non-traded carbon savings (£3.0bn to £4.8bn) and traded carbon allowance savings (£1.4bn to £1.5bn).

Other key non-monetised benefits by 'main affected groups'

The health benefits arising from warmer homes have not been monetised, nor have any net increases in employment. Other instances include the benefits of the policy helping the UK to meet its renewables target more cost effectively than alternative methods, and the possible driving out of rogue traders from the construction sector. Jobs are likely to be created in the solid wall insulation market where demand is expected to rise steeply. These benefits have not been monetised.

Key assumptions/sensitivities/risks

3.5%

The Energy Company Obligations are quantity instruments requiring a certain level of savings to be achieved from installing measures. There is uncertainty over the costs to energy suppliers of meeting the obligations and the consequent bill impacts. There is also uncertainty over the take-up of measures through Green Deal finance. Sensitivities include fossil fuel prices, learning rates for installation costs and consumer demand.

BUSINESS ASSESSMENT (Chosen Option)

Direct impact on business (Equivalent Annual) £m:	In scope of	Measure qualifies
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Costs: 1,265	Benefits: 0	Net: 1,265	Yes	IN
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1. Executive Summary

This is a final stage Impact Assessment for the Green Deal and the Energy Company Obligation (ECO). The **Green Deal** is a novel financing mechanism and a framework of advice, assurance and accreditation for the energy efficiency supply chain for homes and businesses. It allows the cost of installing energy efficiency measures to be financed through a charge attached to a property's electricity meter. The **ECO** places three obligations on energy suppliers: a Carbon Saving obligation, a Carbon Saving Communities obligation (with a minimum Rural Safeguard target) and an Affordable Warmth obligation. These can be met by installing measures which reduce carbon emissions or energy bills, respectively, in the domestic sector. To meet the obligations suppliers will promote and subsidise measures.

Given the innovative and open market nature of the new Green Deal mechanism, the ability of the models used in this assessment to project with certainty the likely uptake of measures is limited. Take-up will be driven by market sentiment and the value people attach to energy efficiency measures in their homes and businesses, but there are reasons to suggest that, once the Green Deal Finance market gathers momentum, the take-up estimates suggested in this assessment could be cautious. As noted in Chapter 7, depending on other policy and market developments there is significant longer term upside potential for the market for energy efficient home improvements to develop beyond government forecasts. A key aim of the Green Deal is to move to a market framework where businesses and other organisations, in addition to energy suppliers, can compete for energy efficiency opportunities in new and innovative ways.

The Green Deal and ECO will work together to address market failures and barriers in the energy efficiency market, and open up the market to a diverse range of competitors. Regulations on energy efficiency are also likely to be introduced for the private rented sector, which will complement these policies. This IA assumes these regulations are likely to come into effect in 2018.

The Green Deal will ease credit constraints by providing low-rate finance, and help to improve trust across the supply chain for measures by providing a broad framework of advice, accreditation and quality assurance to give confidence to market participants and consumers. The ECO will provide a level of certainty on uptake of measures and complement the Green Deal by providing additional subsidy for measures which Green Deal finance alone would not deliver, but that are part of a socially cost-effective strategy for meeting the UK's carbon targets. ECO carbon targets will total 27.8MtCO₂ between January 2013 and March 2015. This total carbon target comprises lifetime savings of 20.9MtCO₂ for the Carbon Saving obligation target and 6.8MtCO₂ for the Carbon Saving Communities target (of which at least 15%, or 1 MtCO₂, must be delivered to rural households – the Rural Safeguard). Within the ECO, the Affordable Warmth obligation will provide insulation and heating measures in order to improve the ability of low income and vulnerable households to heat their home at an affordable cost. The Affordable Warmth target will require energy suppliers to

achieve a total reduction in lifetime notional space and water heating costs of £4.2bn by March 2015.

Implementation of the Green Deal and the ECO will accelerate improvement in the energy efficiency of buildings and thereby supports three Government objectives to:

- reduce UK Greenhouse Gas (GHG) emissions;
- address the drivers of fuel poverty; and
- maintain the security of UK energy supply.

The Green Deal and ECO consultation was published on 23rd November 2011 with a central proposal for these policies. More than 600 consultation responses were received. Following the responses received and further engagement with stakeholders some changes have been made to the final policy that is being legislated. The Government response published alongside this final impact assessment sets out the full detail of the responses received and final policy¹. Specific changes relevant to the impact assessment are listed here:

For the Green Deal:

- **Consumer protection:** In view of the timetable for when the Green Deal framework becomes operational we will create a dedicated Green Deal Ombudsman service, instead of integrating ombudsman services within the Financial Ombudsman Service and Energy Ombudsman Service. Consumer protection has also been strengthened through a revised policy on assessor impartiality and cold calling, as well as protections for lower than average energy users. Options for disclosure and acknowledgement redress have also been developed, as has the policy on appeals. More detail is set out in the Government Response.
- **Provider authorisation costs:** Excessive burdens on Green Deal providers have been removed, to facilitate market entry and prevent unnecessary red-tape costs. Consumers will be protected in case of provider insolvency or loss of authorisation through amendments to the Green Deal Arrangements Agreement, and including requirements in the Green Deal Framework Regulations. The warranty requirements have been simplified, requiring providers to include a minimum 5 year warranty for all measures installed plus 10 years of cover for consequential building damage, the exceptions being solid wall insulation (SWI) and cavity wall insulation (CWI) which will require 25-years' cover. Cost-effective warranties are already available in the market for both CWI and SWI so Green Deal Providers could make use of these as part of their offering to consumers if they meet the requirements in the Code of Practice and Green Deal Framework Regulations. In addition, we have also removed the requirement for Green Deal providers to have an independent conciliation service in place to offer customers an alternate route of redress. Instead customers will have access to the Green Deal Ombudsman service. These changes in policy will remove additional costs for Green Deal providers and customers whilst still ensuring appropriate consumer protections are in place. We have also amended the suggested policy on additional consumer protections where Green Deal finance offered is in excess of £10,000. We have removed the requirement for Green Deal providers to reduce the energy

¹ See http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

savings estimate by 5% but are keeping the obligation for Green Deal providers to ensure customers have received at least 3 quotes where possible.

- **Green Deal finance charge:** We are only allowing fixed rate Green Deal plans to be offered to domestic customers. However, in order to seek to maximise the potential volume of eligible measures we are proposing to permit the whole charge to rise by 2% every year. The schedule of repayments would be fixed at the outset so all future repayments will be visible to the customer at the start of the plan.
- **Measures and products:** Following the consultation, the list of eligible measures has been extended from 30 to 45 measures. The new measures are particularly relevant to the non-domestic sector. In relation to product assurance, we have included a new provision in the Code of Practice to require that Green Deal Providers confirm with their suppliers that the products to be installed in a Green Deal property are a type capable of – or designed to – deliver the level of fuel bill savings estimated for the “measure” during the Green Deal Assessment. This means consumers can be confident the products installed should deliver the estimated energy savings. We will no longer require registration of all Green Deal products but will continue to require that spot-checks for compliance are undertaken. This will result in significant administration savings and ensure legal compliance with EU laws.
- **Supplier licence proposals:** The consultation stage Impact Assessment proposed an annual fee of £3 per Green Deal Plan to be paid by providers to energy companies for routing Green Deal charges to finance providers. Following consultation, fees now will be charged at the rate of 1p/plan/day invoiced on a quarterly basis which simplifies fee calculation. We have decided to allow smaller suppliers to collect a higher fee of 2p/day/plan from providers which will make it easier for them to compete, but a levelisation procedure will operate which ensures that Green Deal providers pay no more overall, in any one quarter, than 1p/day/plan. It has also been agreed with stakeholders that Green Deal Providers will pay for use of the existing Data Transmission Network, as opposed to the development of a new secure method for data transfer. Through consultation, this was decided to be the best value for money option for secure transfer of data between the new central charge database and its users (suppliers and Green Deal providers).

In addition, the following has been clarified through the consultation process, leading to a change in modelling assumptions:

- **Assessments:** The consultation stage Impact Assessment assumed that those households commissioning Green Deal assessments who did not proceed to take-up a Green Deal paid for the assessments up-front. In the central case in this IA, it is assumed that some of the assessment costs will be paid upfront when households do not take out a Green Deal, while the rest of these costs are recovered from Green Deal customers. The market is likely to develop a range of business models, however. While paying a proportion of costs up-front for assessments decreases the numbers of assessments, it would be expected to increase the take-up rate for measures, as some of the costs of failed assessments will not be passed on to those taking out the Green Deal, increasing the proportion of measures meeting the Golden Rule.

The reasons for and implications of these changes are discussed in Annex G.

For the **ECO**:

- **The balance between the Affordable Warmth target and the Carbon Savings target:** The ECO will consist of an Affordable Warmth target, a Carbon Savings target and an area based Carbon Saving Communities (CSC) target focused on the delivery of carbon reduction measures to the 15% most deprived areas and eligible rural households in Great Britain. Within the CSC, suppliers will be required to deliver at least 15% of their CSC obligation to households in rural areas who are in receipt of specified means tested benefits (the 'Rural Safeguard' target). The CSC obligation is expected to result in delivery of around 47% of the insulation measures supported through ECO to low income and vulnerable households.
- **ECO eligibility criteria:** A number of consultees expressed concern about discontinuation of subsidy support for all CWI and loft insulation (LI), and emerging evidence on SWI suggests that its cost-effectiveness is lower than assumed in the consultation assessment². The final eligibility criteria for the three obligations are:
 - Affordable Warmth obligation: The eligibility criteria are as specified in the consultation document and have been broadened to include some households on Working Tax Credit and raising the age threshold for households with children from age 15 to children aged 16 (or in full time education).
 - Carbon Savings obligation: Hard to treat CWI and SWI (and other insulation measures packaged with these) are eligible. The eligibility criteria were broadened to include a subset of CWIs that are unlikely to meet the Golden Rule³ without subsidy. An ECO policy option that included *all* CWI and LI was also modelled. Although this option could, in the short term, lead to higher carbon savings (19% greater savings p.a. in March 2015) and have a greater net present value, it presents a significant trade-off risk for Green Deal finance, with the potential to undermine the delivery of the wider Green Deal programme. (As noted above, there are reasons to believe that, once the Green Deal market gathers momentum, take-up estimates currently suggested could be cautious, with cope for more measures which under this option would be promoted under ECO to be delivered in fact by Green Deal, with the beneficiary rather than the general bill payer meeting the costs). Such a broadening of the scope for ECO eligible measures would probably lead to a large share of ECO being spent on measures that could have otherwise been delivered with Green Deal finance only, as they meet the 'golden rule'. This would have a negative impact on the Green Deal finance market and put at serious risk the development of the future solid wall insulation market (see section 3.6 for more details) with implications for longer term cost effective carbon savings. These tradeoffs are discussed in more detail in Annex H.
 - Carbon Saving Communities obligation: All insulation measures, including all CWI and LI are eligible. Suppliers are required to deliver measures to households in the most deprived areas (i.e. the bottom 15% measured on the English, Welsh and Scottish

² DECC has taken new evidence into consideration that shows there is a larger variability in savings from SWI amongst different households than previously assumed. Whilst SWI still has a large potential for saving energy in comparison to most other measures, it is also very costly. The variability combined with high costs, make SWI on the whole, less cost-effective than previously assumed in Green Deal and ECO consultation IA. For more details on the variability on SWI energy savings that has been modelled – see Annex A

³ Please see section 'More detail on the Green Deal' in 3.5 for a full description of the Golden Rule.

indexes of Multiple deprivation. Up to 20% of the activity undertaken by suppliers to meet this target can be in adjacent areas. Suppliers can also assist households in rural areas (i.e. in settlement with fewer than 10,000 inhabitants) who are in receipt of one of the Affordable Warmth qualifying benefits. They are required to deliver at least 15% of the CSC obligation to these low income households in rural areas.

- **Allocation of the obligation:** Suppliers with a customer base of less than 250,000 customer accounts will be exempt from the ECO. We will divide the ECO between energy companies on the basis of their share of gas and electricity supplied, as this is expected to result in an improvement in the distributional impacts of the policy compared to the consultation proposal. The obligation will be tapered for suppliers passing through the qualification threshold to support competition in the retail energy market.

Further details on these policy decisions are provided in Annex H.

Table 1, below, shows how the estimated take-up of measures under the central scenario has changed between the consultation IA and this IA; by changing the modelling methodology only, and by changing the policy mix as well. Overall, the impact of these changes has been to reduce the projected number of solid wall insulation installations, and increase the number of cavity wall and loft insulations expected to be taken up since the consultation IA. There is a high level of uncertainty associated with these uptake projections, due to the innovative and market based framework of the Green Deal.

Table 1: Cumulative take-up of measures to March 2015 ('000s)

Measure	Consultation IA	Final IA (Consultation policy proposal with updated methodology)	Final IA's policy mix
Solid Wall Insulation	377	275	147
Cavity Wall Insulation	664	410	830
Loft Insulation	202	247	364

The Impact Assessment uses models which are based on information from consumer surveys designed to reveal preferences towards the main energy efficiency measures. Demand modelling has used these stated consumer preferences to estimate the level of subsidy that would have to be offered by suppliers to attract sufficient demand to meet their ECO targets. Further details on the Green Deal Household Model are in Annex B. The model attempts to capture the combined impacts on demand of the various aspects of the policies, not just the price elasticity of consumer demand. This paper assesses the impacts of the final policies that will be legislated. These impacts are compared to a counterfactual where the policies are not introduced (discussed in section 6).

The policies are estimated to lead to a carbon saving of 0.38MtCO₂ p.a. by March 2015 and 1.8MtCO₂ MtCO₂ p.a. by 2020, and have a positive Net Present Value of £8.3billion.

Table 2: Headline central estimates of social impacts of the Green Deal and ECO (£m unless otherwise stated)

	Central estimate
Installation costs (m)	£10,121

Additional costs	£3,468
Assessment costs	£1,214
Finance costs	£1,522
Cost to business (excluding ECO)	£945
Administration costs	£40
Total costs (£m)	£17,311
Energy savings (Variable element)	£14,988
Comfort benefits	£3,450
Air quality benefits	£1,434
Lifetime non-traded carbon savings	£4,272
Lifetime EU Allowance savings	£1,471
Total benefits (£m)	£25,616
Net Present Value (£m)	£8,305
Equity-weighted NPV	£20,241
2020 Non-traded carbon savings (MtCO ₂ pa)	1.8
Life time non-traded carbon savings (MtCO ₂)	84
Cost effectiveness £/tCO₂	-£48

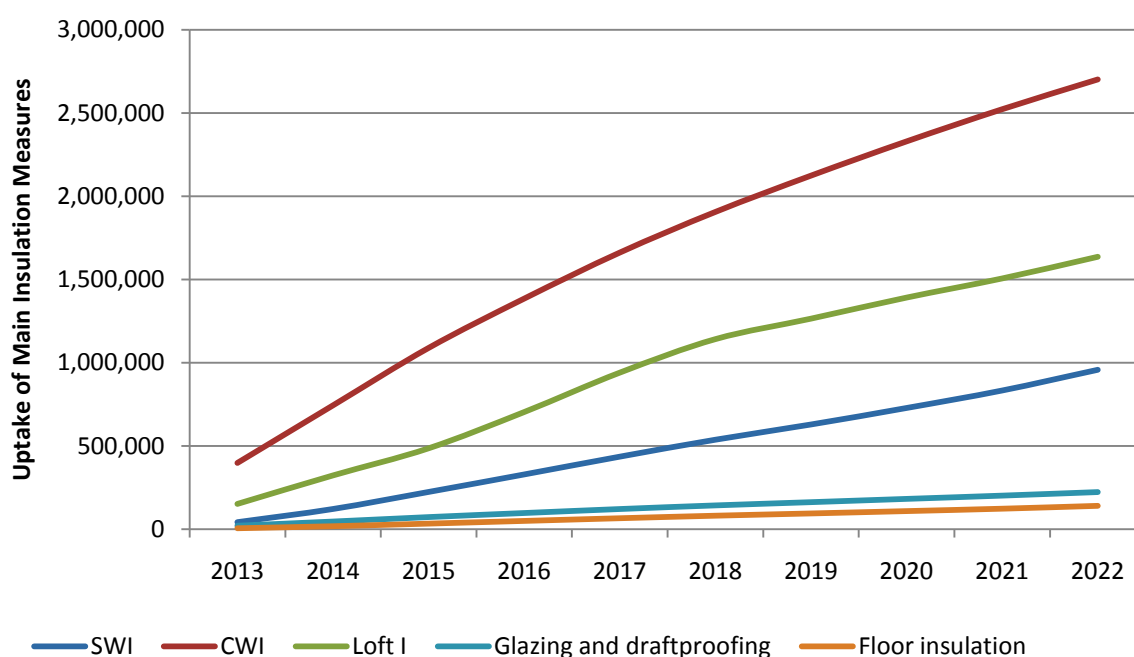
The uptake of the key energy efficiency measures are shown in Figure 1 below. It is estimated that around 960,000 SWI, 2,700,000 CWI and 1,640,000 LI installations would be taken up by the end of 2022, in addition to around 1 million heating measures as part of the Affordable Warmth obligation.

The ability of models to fully capture the likely uptake of measures is limited, given the innovative and open market characteristics of the Green Deal and ECO policy framework. The Green Deal will enable the development of new business models and delivery systems, therefore predicting the uptake of Green Deals in the market is inherently difficult (see section 7.1 for detailed discussion). This means there is inevitable uncertainty around the take-up estimates presented in this Assessment. Given the uncertainties surrounding the development of this market, the figures presented above are a central assumption; however, the range of possible scenarios is very broad (see section 7.5 for sensitivity analysis). Greater certainty will emerge as the evidence base develops over the next few years. As the ECO is a quantity-related obligation, the total carbon savings delivered through this mechanism are relatively certain, but the mix and costs of the measures delivered are less so. The uncertainty around the costs to energy suppliers of achieving their obligations relates particularly to energy prices and consumer preferences. Sensitivity analysis to assess the impact of these uncertainties shows that the actual costs of delivering the ECO target varies considerably between scenarios, and that the uptake of measures wholly financed by Green Deal only also varies. These uncertainties will be managed by a strong monitoring and evaluation of the policies. As we develop our approach to monitoring and evaluation of the Green Deal and ECO, we will publish further details. Outside the ECO mechanism there is also less certainty of take-up, as this will be driven by market sentiment and the value people attach to energy efficiency measures in their homes and businesses. Nevertheless, there are strong reasons to suggest that, once the Green Deal Finance market gathers momentum, the take-up estimates suggested in this assessment could be cautious.

In response to the consultation, there were concerns about the discontinuation of subsidy support for CWI and LI. We have decided to include hard to treat cavities (and lofts if bundled with them) in the Carbon Saving obligation and establish a new Carbon Saving Communities sub-obligation, under which all insulation measures will be eligible. Modelling estimates suggest that this could lead to the insulation of an extra 540,000 lofts and cavities by March 2015 – suggesting a greater mix of types of insulation and smoothing the transition from easier to treat insulation to SWI. Industry responses to the consultation have suggested that the reduction in basic insulation measures (CWI and LI) may induce loss of jobs and closure of manufacturing capacity, given that skills and resources could not be expected to be redeployed in the SWI sector. However, support for hard to treat CWI and SWI which are more labour intensive than easy to treat CWI and LI, is expected to compensate for any reductions in capacity and to increase the number of jobs in the insulation sector to around 39,000-60,000 by 2015 (see section 7).

It is estimated that the cumulative volume of Green Deal finance would be between £1.1bn and £1.3bn by 2015 and between £3.2bn and £4.1bn by 2022⁴.

Figure 1 Cumulative uptake for main energy efficiency measures in the domestic sector up to 2022, including BAU

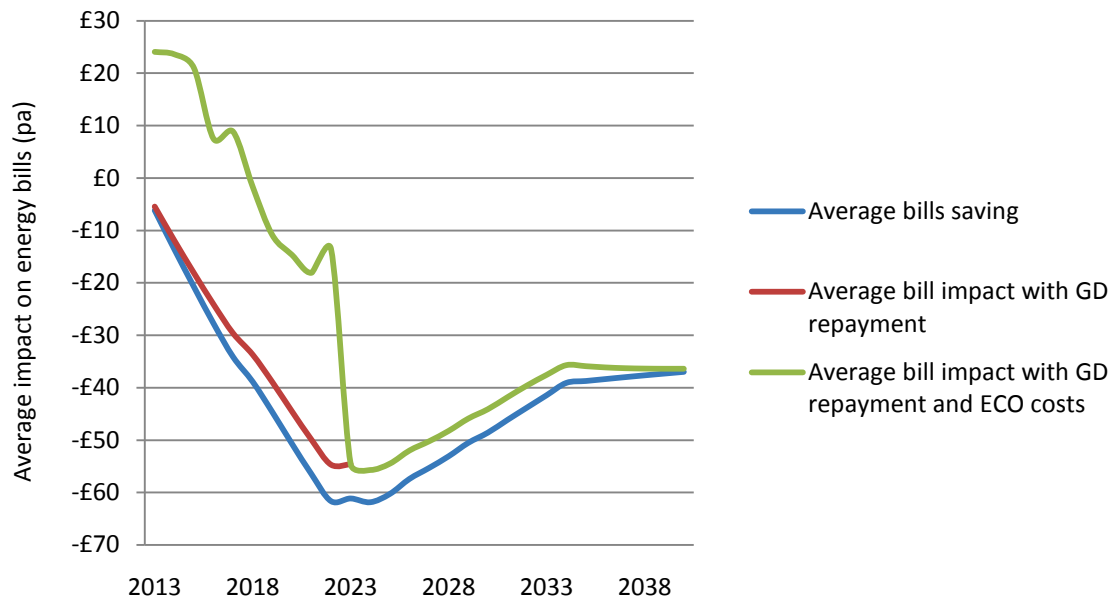


The estimated impact on average domestic energy bills is shown in Figure 2. The costs of measures delivered by Green Deal finance will be borne by the beneficiaries of the measure, but the ECO will be funded through energy bills. This means that, in the nearer term, average bills (green line) will increase as measures begin to be rolled out, compared to no policy. However, households currently pay for energy companies' CERT and CESP compliance through their energy bills, so the impact compared to existing bills is likely to be small. In the longer term, as more households experience bill savings from the measures installed and the costs of ECO are no longer recouped through energy

⁴ This is assuming all privately financed measures use Green Deal finance to fund them.

prices, average bills will decrease overall for a sustained period of time. The final ECO policy design is estimated to lead to a broadly similar impact on energy bills as a percentage of average income across most income deciles (see section 8.7). The uncertainty of the overall distribution of ECO benefits is discussed in Annex H.

Figure 2 Average domestic energy bill marginal impact from Green Deal and ECO



2. Introduction

This final stage Impact Assessment accompanies the Government Response to the Green Deal and the Energy Company Obligation (ECO) consultation which ran from November 23 2011 to January 18 2012. Evidence gathered from the more than 600 consultation responses has informed policy development and the estimates of the costs and benefits of the policies that are being implemented.

The document has the following structure:

- The **Rationale for Government Intervention** section sets out the objectives that improved energy efficiency would help to achieve, and the market failures and barriers that depress uptake of energy efficiency measures (section 3). It also describes the reasons behind the shift in support towards more hard to treat measures, how the policies will work together and alternative policy options.
- The **Background on Current Policies and Energy Efficiency Market** section covers the current policy context and the market for energy efficiency measures in both the domestic and non-domestic sectors (section 4).
- The **Analytical Approach** section explains the analytical methodology adopted, including the use of three models to project the impact of the policies: The Green Deal Household Model, the Affordable Warmth model and the non-domestic Green Deal model (section 5).
- The **Counterfactual** section sets out projections for take up of energy efficiency and heating measures in the absence of the Green Deal and ECO policies (section 6).
- The **Aggregate Impacts** section provides the assessment of the impacts of the Green Deal and the ECO relative to the counterfactual. This includes a central assessment of the impact of the policies on carbon emissions, energy consumption, employment and installation of measures as well as a distributional analysis. Sensitivities on the projections are analysed and the uncertainty over the costs, benefits and distributional impacts of the policies set out (section 7).
- The **Green Deal mechanism** section sets out the costs associated with the Green Deal's framework of advice, accreditation and assurance (section 8).
- The **ECO** section sets out the costs associated with administering the ECO scheme (section 9).
- The **Wider Impacts** section provides an assessment of a range of further impacts including on health, sustainability, equality, competition and rural communities (section 10).
- The **Post Implementation Review** section summarises the evaluation strategy that DECC is implementing to monitor the Green Deal and the ECO and inform the policy (Annex K).
- Finally the **Annexes** provide further detail on the analytical inputs, methodology and policy decisions.

3. Rationale for Government Intervention

3.1. Objectives supported by improved energy efficiency

1. Implementation of the Green Deal and the ECO supports three Government objectives, to:
 - reduce UK Greenhouse Gas (GHG) emissions;
 - maintain the security of UK energy supply; and
 - address the drivers of fuel poverty.
2. GHG emissions from buildings (domestic and non-domestic) were 93MtCO₂e direct and 111MtCO₂e indirect in 2009. This was 43% of total UK GHG emissions. Carbon budgets and the UK's 2050 target⁵ will not be able to be met without reductions in emissions from the built environment. Emissions can be reduced by:
 - reducing the carbon intensity of energy supply;
 - improving the efficiency with which energy services are produced; and
 - reducing demand for energy services.

Analysis indicates that there is substantial cost-effective energy efficiency potential. The costs of meeting carbon budgets will be substantially increased if this potential cannot be delivered.

3. The UK is increasingly dependent on fossil fuel imports, with the result that the UK is becoming more exposed to risks from rising global demand, limitations on production and price volatility. UK production of oil and gas has fallen from 134% of national demand in 2000 to 76% of demand in 2010. Published projections show a further fall to 52% in 2020⁶. Improved energy efficiency reduces the UK's demand for fossil fuel.
4. Improving the thermal efficiency of domestic properties addresses a root cause of fuel poverty. A household is currently defined as fuel poor if it would need to spend more than 10% of its income on adequate energy services⁷. The Government has a statutory target to eradicate fuel poverty, as far as reasonably practicable, in England by 2016. Estimates suggest around 3.9 million households were fuel poor in England in 2012⁸. The Scottish Government has a target to eliminate fuel poverty as far as is reasonably practicable by 2016 and the Welsh Assembly Government has a target to ensure that no household is living in fuel poverty by 2018.
5. Energy efficiency improvements can also have further benefits including:

⁵ The Climate Change Act 2008 sets a legally binding target of an 80% reduction in emissions relative to 1990 levels by 2050.

⁶ https://www.og.decc.gov.uk/information/bb_updates/chapters/production_projections.pdf

⁷ In terms of levels of warmth, this means achieving certain temperature standards (defined as 21°C for the main living area and 18°C for other areas), for a certain amount of time each day, depending on a household's circumstances. Allowances are also made for what a household needs to spend for water heating, lighting and cooking. The Government is committed to adopting a new definition of fuel poverty for England following the Hills Fuel Poverty Review. There will be a consultation in late 2012. For more on the Hills Fuel Poverty Review see: http://www.decc.gov.uk/en/content/cms/funding/fuel_poverty/hills_review/hills_review.aspx.

⁸ http://www.decc.gov.uk/en/content/cms/statistics/fuelpov_stats/fuelpov_stats.aspx

- where cost-effective, energy efficiency measures in the non-domestic sector can improve productivity, with the potential to boost growth and business competitiveness;
 - many low income and vulnerable households under-heat their homes relative to need. Living in cold conditions is linked to a number of detrimental mental and physical health impacts. Improved thermal efficiency, leading to increased indoor temperatures, has a positive impact on the health and wellbeing of household members.
6. In December, the Government published the Carbon Plan, outlining its strategy to meet the UK's decarbonisation objectives. Heating and powering the UK's building stock is currently responsible for over a third of the UK's emissions, but the building sector will need to be almost completely decarbonised by 2050 in order to cost-effectively meet our objectives. Reducing energy demand is the cheapest means to cut emissions, and energy efficiency measures make it possible to cut bills alongside emissions.
7. This Impact Assessment estimates that up to 1 million solid wall insulations will be completed by 2022. It also estimates that 1.2m easy to treat cavities will be filled out of the current potential of 2.6m. Including loft top-ups of around a quarter of the 6m potential and the non-domestic sector's abatement, this contributes 9 MtCO₂ of savings within the second Carbon Budget period and a further 16 MtCO₂ to the third (see Table 3).

Table 3: Contributions to Carbon Budgets

	Carbon Budget Period	
	2: 2013-17	3: 2018-22
Legislated Budget (MtCO₂e)	2,782	2,544
Reduction Required from Previous Budget (MtCO₂e)	236	238
Contribution expected from domestic sector (MtCO₂e)⁹	6.3	9.0
Contribution expected from non-domestic sector (MtCO₂e)¹⁰	2.5	6.5

3.2. Market failures and barriers

8. There are market failures and barriers which could reduce the take up of energy efficiency measures to below the socially optimal level. A number of these are addressed or reduced by the Green Deal and the ECO:
- **Prices do not reflect negative externalities:** externalities associated with GHG emissions are not fully reflected in the price of energy. Private decisions to consume

⁹ Carbon savings of 15.4MtCO₂ delivered in Carbon Budget 3, but 9MtCO₂ is the additional abatement delivered over and above their contribution in the previous carbon budget period.

¹⁰ Carbon savings of 9 MtCO₂ delivered in Carbon Budget 3, but 6.5MtCO₂ is the additional abatement delivered over and above their contribution in the previous carbon budget period.

energy will not consider the wider social impacts of emissions leading to over-consumption.

- **Access to capital:** Many households and some organisations cannot access conventional finance markets to fund energy efficiency improvements, while other households and organisations may face high costs of capital that do not reflect the particular nature of energy efficiency investments i.e. a reliable stream of bill savings.¹¹ These households and organisations are credit constrained with their opportunity cost of investments in energy efficiency measures exceeding the social discount rate. This leads to under-investment in energy efficiency capital compared to the social optimum.
- **Lack of information and information asymmetry:** a market failure preventing the take-up of cost effective measures is the lack of trusted information for consumers (including businesses) who do not have easy access to, or a full understanding of, information on energy efficiency measures available to them^{12 13 14}. Consumers may not feel confident in assessing the risk of buying a poor quality service and may prefer to withdraw from the market or heavily discount the claimed savings from energy efficiency measures¹⁵.
- **Positive externalities:** by creating a bigger market in the installation of energy efficiency measures, the Green Deal could create the positive externality of reducing installation costs for future time periods. Learning by doing could create productivity improvements either through installers improving their installation processes or if manufacturers develop systems that are easier to install. Because households and organisations do not value these benefits at the point of their own consumption, if left alone the market for energy efficiency measures would deliver a socially sub-optimal outcome. There would be lower deployment and persistently higher costs for energy efficiency measures. Intervention to promote deployment could address the market failure.
- **Social and psychological inertia:** energy consumers may be slow to change behaviour or adopt energy efficiency technologies even when, from an objective viewpoint, they offer benefits to the consumer¹⁶. The concept of bounded rationality explains some of this inertia, i.e. that consumers can only cope with a limited amount of information at any one time. However, cultural and other psychological factors are also likely to have a role

¹¹ DECC's Green Deal Consumer Survey (2011) shows that the main reason people are prevented from making their homes more energy efficient is a lack of money.

¹² Royal Institute for Chartered Surveyors (2010) "Energy Efficiency and Value Project" noted a lack of consistent or easy to access information on energy efficiency and that this influenced a low level of demand for energy efficiency measures.

¹³ DECC's consumer research (2011) shows that after requests for lower costs, having access to convincing information about benefits and information from a trusted source are the main reasons given for what would encourage people to make their homes more energy efficient (see Annex D).

¹⁴ It is important to note that under the Energy Performance of Building Regulations, there is a duty on estate agents to disclose either the Energy Performance Certificate (EPC) in full or the EPC property asset rating, along with the written particulars of a domestic property which is on the market for sale. This implements the Energy Performance of Buildings Directive. The Department for Communities and Local Government (CLG) is considering proposals to amend the regulations to remove the element of choice (creating an obligation on agents to produce the EPC at the same time as the written particulars). CLG is also considering proposals to extend the regulations to cover the non-domestic and rental sectors. These proposals would improve the information available to consumers and support Green Deal objectives.

¹⁵ Akerlof (1970) "The Market for Lemons", Quarterly Journal of Economics

¹⁶ 19% of people that have not installed basic, low cost, insulation measures are completely unengaged with the issue. Defra

(2009) Public Attitudes and Behaviours Towards the Environment Survey 2009 and Energy Saving Trust (2009) Qualitative Research.

to play, such as aversion to a perceived debt and social norms. The presence of real, but “hidden” costs, for example the real costs of devoting the time required to assess potential investment options, will also explain some inaction. This is true for households and particularly for organisations, for whom management time and attention is a more closely monitored scarce resource.

- **Misaligned incentives:** examples of misaligned incentives for energy efficiency of buildings are the landlord-tenant or the builder-homebuyer relationships. In both cases the first party decides the level of energy efficiency of the building while the second bears the costs associated with energy consumption. Faced with this barrier individuals are encouraged to only consider the investment case for energy efficiency measures for the length of their own expected tenure. Improved energy efficiency performance of buildings reduces the ongoing operating costs for the property. In principle, this should be capitalised in the value of the property or reflected in the rental value, generating value from energy efficiency investments for the builder or landlord. This would therefore overcome the misaligned incentives barrier. However, the energy efficiency of the property is relatively marginal relative to other characteristics such as size and location. The Royal Institute of Chartered Surveyors suggest that there is currently little demand for energy efficiency from UK home buyers and, as such, market participants do not assign value to it¹⁷.
- **Time inconsistent private discount rates:** Hyperbolic, or time inconsistent, private discount rates may prevent the uptake of energy efficiency measures. High short-run private discount rates¹⁸, mean that consumers are likely to value up-front capital costs substantially more highly than future bill savings, resulting in under-investment in energy efficiency capital.

3.3. Distributional rationale

9. Expenditure on energy – including essential components such as heating – can represent a disproportionate share of available resources for different groups in society. Typically for those households with the fewest resources spending on energy represents a greater proportion of their budget than for better off households.¹⁹ High energy bills, compounded by energy inefficient homes, are regressive in that a low income households would need to spend a greater proportion of their income to pay the same bill than a more wealthy household. Addressing the thermal efficiency of homes, particularly those lived in by low income households, will help mitigate disparities between different groups as well as overcoming financial constraints that prevent some households from upgrading the efficiency of their homes independently.

¹⁷ Royal Institution of Chartered Surveyors (2010) “Energy Efficiency and Value project”

¹⁸ Individuals’ discount rates have been observed to be inconsistent over time and can be described by hyperbolic discount functions, where the rate of pure time preference is initially very high but declines over time (Frederick, Loewenstein and O’Donoghue 2002).

¹⁹ See DECC (2011), “Estimated impact of energy and climate change policies on energy prices and bill”, Chart 10, available at: <http://www.decc.gov.uk/assets/decc/11/about-us/economics-social-research/3593-estimated-impacts-of-our-policies-on-energy-prices.pdf>

10. The Hills Fuel Poverty Review, published in March 2012, concluded that the thermal efficiency of homes is a key driver of fuel poverty, and that fuel poverty itself is a serious problem.²⁰
11. Professor Hills found that while energy efficiency was not the only driver of fuel poverty, delivering energy efficiency and heating measures provide the greatest long term impacts on reducing the extent and depth of fuel poverty. In 2009, around 55% of houses with a Standard Assessment Procedure (SAP) rating of 30 or below were lived in by fuel poor households and around 60% of all fuel poor households reside in a home with a SAP of 50 or below, indicating that there is significant scope for energy efficiency to contribute to reducing fuel poverty.²¹

3.4 Cost effectiveness rationale

12. In order to meet the UK's carbon challenges, the Government aims to promote the most cost effective energy efficiency measures. It must do this in an efficient way, however, by encouraging cost reductions from learning and economies of scale in those technologies on which the bulk of future carbon abatement will rely.
13. Around 15% of the domestic sector's remaining abatement potential lies in relatively inexpensive loft top-up insulation and easy to treat cavity wall insulation; the remaining potential is split between solid wall insulation (67%) and hard to treat cavity wall insulation (18%). In order to tap into the bulk of this potential in a cost effective way, policies now need to focus on supporting these more costly measures to start driving their costs down.
14. Including all insulation measures in a single obligation mechanism is unlikely to achieve this aim, as the least costly measures would be targeted first. Then, as their remaining potential becomes harder to find, the incentives on offer to the remaining easy to treat households are likely to rise well above the cost of the measures themselves²², and delay further the take-up of more costly measures²³ (see figures, below, and section 9.1 for a fuller discussion of how different costs of abatement benefit those offering the cheapest form of abatement); bringing about large transfers from energy bill customers to households with low cost abatement measures. The net result of which is little support for solid wall and hard to treat cavity wall insulation and further postponement in delivering their cost reductions (although cost

²⁰ In Spring 2011, the DECC Secretary of State commissioned Professor John Hills from the London School of Economics to carry out an independent review of the fuel poverty definition and target. Professor Hills' final report, published in March 2012, concluded that fuel poverty is a serious problem and recommended changing the approach to measuring fuel poverty. The Secretary of State for Energy and Climate Change has committed to the adoption of a revised approach to measuring fuel poverty in England by the end of the year and to the publication of a consultation on the new approach that the government will propose in late 2012.

²¹ DECC (2012). "Annual Report on Fuel Poverty Statistics 2012", Available at:

http://www.decc.gov.uk/en/content/cms/statistics/fuelpov_stats/fuelpov_stats.aspx

²² The total delivered cost of an insulation measure within a compliance obligation mechanism, such as ECO or CERT, is likely to be significantly higher than the cost of the measure's labour and materials. This is because of the costs of the mechanism (Green Deal mechanism costs, assessments etc.), search and advertising costs to identify appropriate households, and any financial inducements required to overcome households' barriers such as inertia or hidden costs. As remaining abatement potential declines, these delivery costs rise even if the installation costs are stable.

²³ There is evidence in the market that energy companies are currently offering households free insulation plus additional financial inducements under their existing obligations. Although solid wall insulation is an allowed measure to comply with energy companies' existing obligations, support for it is at very low levels.

reductions are not explicitly modelled in the IA). This is also the case if only loft insulation was allowed alongside the more costly measures (i.e. excluding easy to treat cavity wall insulation); there could also be an incentive to game the system by removing existing loft insulation if there were financial inducements to do so.

Figure 4: CWI uptake and potential

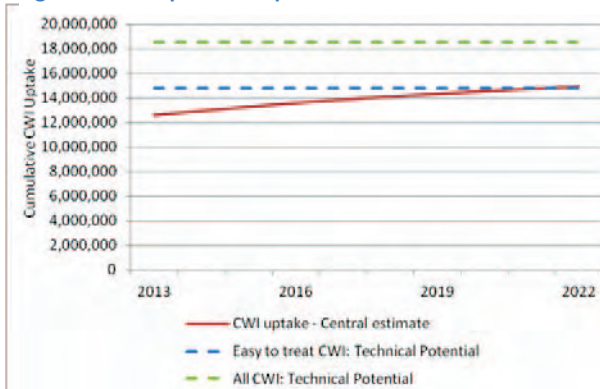


Figure 3: SWI uptake and potential

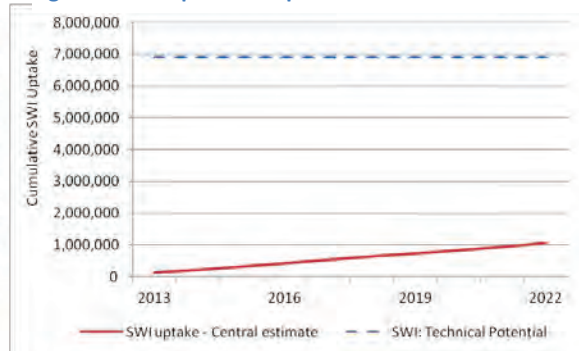
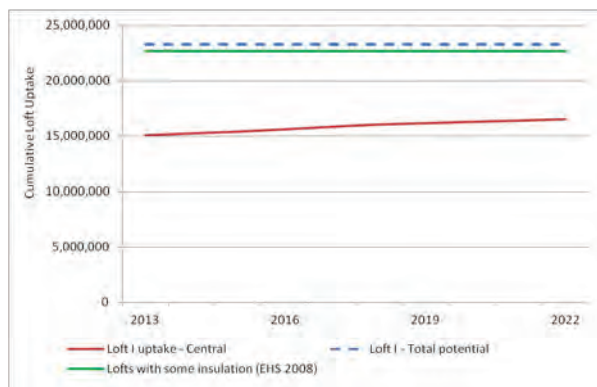


Figure 5: LI uptake and potential



3.5 Description of the policies

15. The Green Deal and the ECO are two complementary policy interventions.
16. **The Green Deal** allows householders and organisations to install energy efficiency measures at no upfront cost. Installation costs are financed by Green Deal Providers who recoup these costs, including interest, through a charge attached to the property's electricity meter. The policy also provides a framework of advice, assurance and accreditation covering the whole supply chain.
17. The **ECO** places obligations on suppliers to meet two carbon targets (one of which includes a rural sub-target) and an Affordable Warmth target in the domestic sector. The actual total carbon target runs between January 2013 to March 2015 and is 27.8MtCO₂ (split into 20.9MtCO₂ for the Carbon Saving Obligation target and 6.8MtCO₂ for the Carbon Saving Communities target, of which at least 1 MtCO₂ must be delivered to rural households – the

Rural Safeguard target). The Affordable Warmth target will require energy suppliers to achieve a total reduction in lifetime notional space and water heating costs of £4.2bn. The targets can be met through a combination of promotion and subsidy. Suppliers can generate their required ECO points either directly, by installing eligible energy efficiency and heating measures, or indirectly by contracting with installers of these measures, for example through a brokerage platform. Previous obligations have shown that subsidy is used to incentivise demand for measures. This could either be direct from suppliers or, via the contracting process, through a third party installer using the funding they receive as part of their contract to deliver ECO measures.

18. The scope of the targets are defined by the eligibility of measures to generate ECO credit or points. This in turn decides which measures could receive subsidy. From the householder's perspective, the subsidy can work together with the Green Deal. A quote from a Green Deal provider or other delivery agent for the installation of measures will be net of any ECO subsidy that is available, reducing the amount the householder would need to finance through the Green Deal or other funding sources. Energy suppliers will also be able to fully subsidise the installation of measures when this is considered necessary to meet the targets.

More detail on the Green Deal

19. An accredited impartial assessment of the property provides the gateway to the Green Deal. Advisors will be qualified to the standards set out in the National Occupational Standards for Green Deal Advisors and certified against the advice standard. All advisors will use an approved Green Deal Assessment tool and provide an assessment of the measures which could be installed in a property, the estimated energy savings that they would achieve and the likely eligibility and level of Green Deal finance that could be accessed to cover the cost of their installation. In the domestic sector the tool will be based on the Reduced Data Standard Assessment Procedure (RdSAP) and in the non-domestic sector the Simplified Building Energy Model (SBEM). In the domestic sector the assessment will include an additional occupancy assessment in addition to a fabric assessment²⁴ to provide feedback to householders about whether their energy use is likely to be above or below that of the typical household. In the non-domestic sector, consideration of occupancy factors will be built into the Green Deal SBEM tool.
20. A key principle of the Green Deal is that the consumer can shop around with the results of the assessment. This ability to compare offers is important, if the Green Deal is to be competitive and offer best value for the consumer. However, if Green Deal Providers carry out an assessment that is immediately available for all competitors to access, this will act as a disincentive to provide assessments at no or low cost. We are exploring options for a short grace period for Green Deal Providers between carrying out an assessment and lodgement, to prevent free-riding by competing suppliers. Discussions with stakeholders are ongoing. Given

²⁴ A fabric assessment is analysis of the energy performance of the building itself based on factors such as its physical dimensions, the type of construction (e.g. solid walls, cavity walls, double glazing etc), the nature of the heating and ventilation systems and lighting, and existing energy efficiency measures in place.

that discussions will focus on the potential to relax the lodgement timetable, the costs to business will not increase as a result.

21. Following an assessment, occupants who are interested in taking out a Green Deal can approach multiple Green Deal Providers for quotes. Accepting a quote will initiate a Green Deal plan, which is a contract between the Provider and the bill payer. The plan sets out the repayment term for the Green Deal and the level of the charge that would be attached to the electricity meter if the financing offer were accepted. For tenants, permission will have to be gained from the property's owner. Should the occupant of the property change, then the Green Deal plan and liability for the charge passes to the new occupants. In between tenancy periods, the landlord would be responsible for paying the Green Deal plan until the new tenant takes over. A system of disclosure and acknowledgement provides safeguards for the transfer of the plan. Installation will be carried out by authorised installers who will have been certified to meet the new installer standard.
22. The framework of assurance and accreditation is set out in the Green Deal Code of Practice. The Green Deal market is voluntary, but to participate assessors, installers, manufacturers and Green Deal providers all have to meet the required standards. This provides assurance to householders and organisations of the quality of the Green Deal offer.
23. The 'Golden Rule'²⁵, which caps the charge placed on the electricity meter, is an important principle of the policy. It states that bill savings in the first year must exceed the Green Deal repayment and that the repayment term must not exceed the expected lifetime of the measure. As such, by providing some assurance that bill savings will exceed repayments for the lifetime of the plan, energy bill default rates should not increase as a result.
24. The maximum installation cost that a Green Deal Provider will be able to finance through the Green Deal finance mechanism is limited by the repayment structure. In year one, the Green Deal charge is capped at the level of expected bill savings, in compliance with the Golden Rule. It is then allowed to rise by 2% per year in nominal terms. It is anticipated that Green Deal providers will ultimately access the capital markets to fund the installation of the measures. To achieve this, Green Deal providers are exploring options to aggregate Green Deals into a Special Purpose Vehicle (SPV). The vehicle would raise capital from investors to fund Green Deals and repay this using the Green Deal repayments. Current indications are that such a vehicle could deliver a cost of capital of around 7.5%, significantly lower than would be expected for other forms of unsecured personal finance (see Annex I for more detail).

More detail on the ECO

25. The ECO will require energy suppliers to promote the installation of measures that are either part of a cost-effective strategy for meeting the UK's carbon target, or that reduce heating costs for low income and vulnerable households, helping to tackle fuel poverty.

²⁵ See Annex G or the consultation stage IA for further description of the Golden Rule

26. The ECO has separate legal obligations: to provide measures specifically intended to reduce GHGs (the 'Carbon Saving' target and the 'Carbon Saving Communities' target with a 'Rural Safeguard' minimum target), and supply measures intended to improve the ability of low income and vulnerable households to heat their homes at affordable cost (the 'Affordable Warmth' target).
27. Each obligation uses target metrics based on the SAP methodology which underpins the assessment tool for the Green Deal as the basic EPC. The carbon reduction targets are set in terms of assessed lifetime CO₂ reduction from the installation of eligible measures, and the Affordable Warmth target is set in terms of assessed lifetime notional heating cost reductions. When within scope of an obligation, an installation will generate a number of 'ECO points' in line with the EPC. (See annex H for details.)
28. For each obligation, the Secretary of State is setting a Great Britain-wide level of ambition (or number of ECO points) which the ECO administrator will distribute to the obligated energy suppliers based on their market share. The allocation methodology is described in more detail in Annex H.
29. Carbon Saving points, Affordable Warmth points, Carbon Saving Communities points and Rural Safeguard points are distinct currencies. Where an installation could generate more than one type of ECO point, energy suppliers choose which obligation the installation counts towards.
30. In the case of Affordable Warmth, only measures installed in an eligible group of low income vulnerable households living in private housing and identified through the benefits system would generate Affordable Warmth points to count towards the suppliers' obligations. Heating systems and the full range of energy efficiency measures are all eligible where they are assessed as reducing the notional cost of heating a property to an adequate internal temperature.
31. The "Carbon Saving obligation" target is intended to deliver energy efficiency measures into harder to treat properties. This is a key element of the policy that will drive up installation rates of these energy saving measures above the levels currently installed. This is necessary to unlock the large remaining potential in harder to treat buildings by driving economies of scale and encouraging innovation in the market, as the remaining installation potential from low cost measures currently being installed shrinks - both in terms of absolute numbers of opportunities and the carbon savings that treating them will unlock. Solid wall insulation and insulating 'harder to treat' cavities will generate ECO carbon points, as will all thermal insulation measures that are packaged with them.
32. The "Carbon Saving Communities" (CSC) target, comprising 20% of the overall carbon target spend, is intended to deliver carbon saving measures to properties in low income areas and allows the full range of insulation measures to be delivered within defined areas. Modelling suggests that the creation of this target should increase the number of LI and CWI measures delivered, relative to the counterfactual, and overall carbon savings. It also drives greater bill

savings for low income households. In theory, the creation of the CSC could result in a greater risk to the creation of the Green Deal market (because measures delivered in low-income areas are likely to require greater subsidy). However, at a level of 20% of the overall carbon target, the modelling suggests the creation of this obligation would have little impact on the demand for Green Deal finance. As such, this option was seen to meet the policy objectives and be consistent with the tenor of consultation responses.

33. The CSC obligation contains a “Rural Safeguard” target to ensure that rural households are not disadvantaged in this element of ECO. This sub-obligation will require suppliers to deliver at least 15% of their overall CSC obligation to household that are either in a rural area and in receipt of one of the AW qualifying benefits, or that are in a rural area which are also within or adjacent to a qualifying low income area. The eligibility criteria for the obligations are also contained in Annex H.
34. Government is working with ECO companies and other stakeholders to develop a brokerage system. Brokerage will be the subject of a further consultation in Summer 2012. The brokerage will enable Green Deal Providers to access the subsidy that is available for eligible measures by selling the ECO points that they will generate to energy suppliers. They will be able to pass through this subsidy to their customers to generate demand. In a competitive installation market the subsidy should all be passed through to householders.
35. The intention is for the policy framework to last for at least 10 years with targets set in phases. The first phase of the ECO will run with targets to be achieved by March 2015. The scheme will be monitored on an ongoing basis with a review in 2014 before the next phase of targets is set.
36. The ECO will complement the Green Deal, providing additional subsidy for measures which the Green Deal alone would not deliver. Complementary funding for measures alongside ECO subsidy could be available from other sources. However, this potential is not taken into account in this assessment.
37. There are measures which do not meet the Golden Rule but are part of a socially cost-effective strategy for meeting the UK’s carbon targets, either because:
 - despite not meeting the Golden Rule they are socially cost-effective now. The Golden Rule does not take account fully of the expected rise in energy prices in real terms over the medium term nor does it factor in environmental externalities; or
 - there are dynamic considerations in developing the best strategy for meeting the UK’s long term targets. Investment now in deploying measures that are not currently socially cost-effective should drive down the cost of the measure for future periods through learning by doing and product innovation. There are also longer term benefits from reducing energy demand. A risk reduction or “hedging” strategy, which develops the foundation for deploying solid wall insulation (and other measures) at scale keeps the option open while more evidence is gathered on effectiveness and the best installation techniques.

38. Not all low income and vulnerable households will be able to finance measures through the Green Deal. Those with high actual energy consumption (low income, high use households) are likely to use sufficient energy for the bill savings from measures to be significant enough to be equal or greater than the repayments attached to a Green Deal package. A significant number of low income and vulnerable households are, however, likely to under-heat their homes and therefore be less likely to generate the bill savings from measures to be equal or greater than Green Deal repayments.

Addressing Market Failures and Barriers

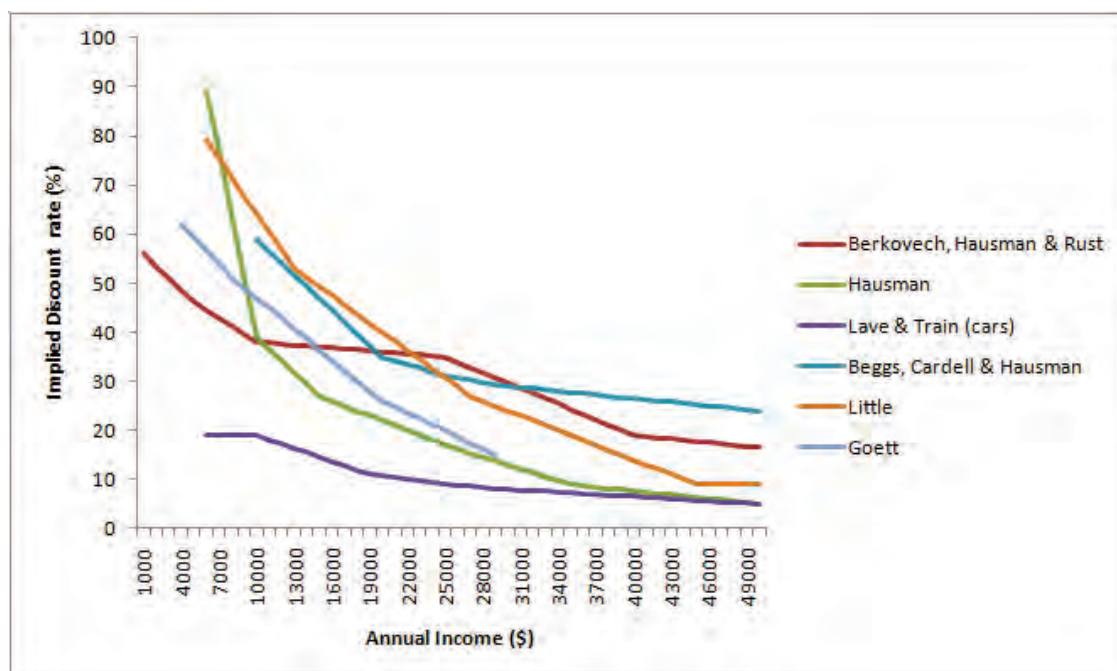
39. The combination of the Green Deal and the ECO will address a number of market failures and barriers to the take up of energy efficiency measures.
40. ECO will address **negative CO₂ externalities** by reducing demand for energy in two ways.
- it will subsidise measures which are (or will be) socially cost-effective but that given the energy price are not privately cost-effective.
 - it will temporarily increase the price of domestic energy if, as expected, energy companies pass through the costs of offering ECO subsidies to energy consumers undertaking energy efficiency measures.
41. **Access to Capital.** Many households cannot access conventional finance markets to fund energy efficiency improvements, while other households and organisations may face high costs of capital that do not reflect the particular nature of energy efficiency investments i.e. a reliable stream of bill savings²⁶. These households are credit constrained with their opportunity cost of investments in energy efficiency measures exceeding the social discount rate.
42. A substantial academic literature has developed on the topic of implied discount rates shown by consumers towards energy efficiency investments²⁷. Many studies suggest that individuals demand a higher rate of return on energy efficiency investments than for alternative investments – an ‘energy efficiency gap’. However, the studies have also shown that there is a strong negative relationship between income levels and the implied discount rates. Those with lower incomes reveal higher implied discount rates and high earners reveal discount rates close to prevailing market interest rates. Figure 6, below, based on Train (1985)²⁸ summarises the relationship between income and discount rate found in a number of studies.

²⁶ DECC’s Green Deal Consumer Survey (2011) shows that the main reason people are prevented from making their homes more energy efficient is a lack of money (see Annex D).

²⁷ Such as: J. Hausman. “Individual discount rates and the purchase and utilization of energy-using Durables”. The Bell Journal of Economics, 10(1):33-54, 1979 or A. Jaffe. “The energy-efficiency gap what does it mean?” Energy Policy, 22(10):804-810, October 1994.

²⁸ K. Train. Discount rates in consumers’ energy-related decisions: A review of the literature. Energy, 10(12):1243-1253, December 1985.

Figure 6: Empirical estimates of the relationship between discount rates for energy efficiency investments and income (Train ,1985)



43. Higher discount rates for those with lower incomes strongly suggest that at least part of the energy efficiency gap can be explained by credit constraints.
44. The Green Deal could significantly reduce the opportunity cost of capital for investments in energy efficiency, particularly for low income households for whom access to credit may otherwise be difficult or at least expensive (such as the high interest rates charged on credit cards). 52% of households currently have unsecured debts, 51% of whom find this debt a burden.²⁹ DECC's Green Deal Consumer Survey (2011)³⁰ found the main reason preventing households from investing in energy efficiency measures was lack of money (35% of respondents) and that groups with higher levels of interest in the Green Deal included those struggling to pay their bills, those on means benefits and those living in deprived areas.
45. Attaching the repayment charge to the electricity bill reduces the default risk for the finance provider relative to unsecured personal loans and should provide lower cost access to capital for energy efficiency investments for lower income householders.³¹ The domestic energy bill default rates are 1.5 to 2 per cent of gross revenue, compared with broader consumer credit costs of default which are significantly higher (see Annex I for more analysis). Paying utility bills and maintaining energy supplies to the home is a necessity and so payments will have one of the first calls on a householder's budget. The application of a conservative Golden Rule

²⁹ Source: *The financial position of British households: evidence from the 2010 NMG Consulting Survey*, Bank of England (www.bankofengland.co.uk/publications/quarterlybulletin/qb100408.pdf)

³⁰ See the Consumer Insight/Social Research – reference to be inserted.

³¹ Indeed, findings from DECC's Green Deal Consumer Survey (2011) suggests that may be welcomed by certain specific groups of low income households. The survey found that interest in the Green Deal is particularly high among these households on low incomes (young, male) and those struggling to pay the bills in hard to heat homes (see Annex D).

calculation methodology means that it is not expected for there to be a substantial impact on the default rate on energy bills as a result of households taking out a Green Deal.

46. **Information and Inertia:** The Green Deal addresses these problems via the accreditation of advisors and installers and providing trusted sources of energy efficiency services.³² The Green Deal also creates a flexible market framework facilitating branded suppliers with existing customer relationships to come forward and market their services. The obligation on energy suppliers will drive the promotion of energy efficiency measures by suppliers and installers.
47. **Positive externalities.** Driving deployment at scale through the ECO obligation will drive learning by doing. This will reduce the cost of energy efficiency measures suitable for harder to treat home for future time periods.
48. **Misaligned incentives.** Tying the finance charge to the property rather than the individual will be attractive to some occupants. They will only be liable to pay the Green Deal charge while they remain in the property and continue to benefit from the measures that were installed. When leaving the property, the charge will pass to the new occupant and beneficiary. In the rented sector, landlords can install energy efficiency measures without paying the cost. Tenants would benefit from lower energy bills, and while they would be liable for the Green Deal charge, overall thanks to the Golden Rule they would be expected to have lower running costs.
49. **Time inconsistent discount rates.** The Green Deal and ECO change the time profile of the costs and benefits of energy efficiency investments. There would no longer be a large up-front financial cost and, either because of the Golden Rule or ECO subsidy, the investment would be expected to show a net benefit, or at least a neutral balance of benefits and costs, in all time periods. The change in how the energy efficiency investment is framed can increase take up.
50. The Green Deal and the ECO will also contribute to meeting the Government's **distributional objectives**. Improving energy efficiency means addressing one of the main drivers of fuel poverty in a way that has the most significant long run impact. Within ECO, the Affordable Warmth obligation will target thermal efficiency improvements at low income vulnerable private tenure households who are most at risk of fuel poverty. In addition, the Carbon Saving Communities obligation will target measures at households in low income areas who are also at risk of fuel poverty. Further, the Green Deal will increase the proportion of the cost of installing measures that is paid for by the beneficiaries. There will be less need for subsidy, paid for by all energy consumers on their bills, to drive the demand for energy efficiency measures.
51. The effectiveness of the Green Deal and ECO will not be determined solely by changes in the price of energy efficiency measures due to the available subsidy or reduced finance costs. The effectiveness of the policies will also reflect how the policies overcome the wider barriers

³² DECC's consumer research (2011) shows that people place great value on accredited advisors and installers with accreditation having a positive impact on their likelihood to take up the Green Deal (see Annex D).

which dampen the take up of energy efficiency measures. The analytical approach outlined in section 5 seeks to assess this full impact of the policies.

3.6 Alternative policy options

52. Alternative options to implementing the Green Deal and the ECO package were considered prior to the introduction of the primary legislation which created the parent powers for the secondary legislation. The UK Government must meet its statutory obligations under the Climate Change Act to reduce UK greenhouse gas emissions (GHG) and its statutory obligations to reduce fuel poverty. A viable alternative proposal must achieve deployment at scale of cost-effective energy efficiency measures - otherwise the costs to the UK of meeting carbon budgets would be substantially increased. It would also have to achieve improvements to the thermal efficiency of low income and vulnerable households to contribute to the Government's fuel poverty obligations.

ECO Only

53. An alternative option where the Green Deal was not implemented but the objectives were met only through the ECO was considered. However, with no Green Deal mechanism, credit constraints associated with householders' investment in energy efficiency measures would not be alleviated. In addition, any self-finance of installation costs would be paid for by the individual rather than tied to the benefitting property and the subsidy would also have to rise to overcome other barriers that would have otherwise been addressed by the supply chain measures in the Green Deal. Because of these effects, there would be an increased role for ECO subsidy.
54. The proportion of the costs of installation of measures paid for by the beneficiaries of the measures would be reduced with greater pass through of (the higher) subsidy costs onto all energy consumers bills. This is a less desirable outcome, in terms of the distributional impacts of the policy, than where a higher proportion of the installation costs are paid for by the beneficiary. The impact could be partially offset through other aspects of the policy design (i.e. through ensuring that a greater proportion of measures were delivered to lower income households).

Green Deal only

55. The option of implementing only the Green Deal was also considered. However, without partial upfront subsidy, many socially cost-effective energy efficiency measures would not meet the Golden Rule. Without the availability of partial subsidies, take up would be low, and below the level required to meet the UK's legally binding carbon budgets cost-effectively. If cost-effective energy efficiency measures are not deployed then other, less cost-effective abatement options would have to be used – increasing the overall cost to the UK of meeting carbon budgets. Low income and vulnerable groups would also be less likely to benefit without the targeted support provided by the ECO, which would have an adverse impact on fuel poverty.

Alternative Funding Mechanisms

56. Subsidies could be provided through a variety of mechanisms. The ECO is one of these, but in principle subsidies could be funded through general taxation, or could take a different form

such as a stream of subsidy payments over the lifetime of the energy efficiency measure (i.e. an energy efficiency 'Feed-in-Tariff'). This stream of payments could again be paid for either through general taxation or through a levy on energy companies.

57. There are benefits to using the ECO to provide the required subsidy. Obligated suppliers in the energy market will face competitive pressures to ensure delivery of their obligation at least cost. SWI is a key pathway technology for the UK towards meeting its 2050 GHG reduction target. Through the ECO there is a strong signal of forthcoming demand for the supply chain to respond to – bringing forward investment from installers to increase their capacity and train additional installers. Through deployment at scale, the costs of SWI are expected to fall through 'learning by doing'.
58. Under the proposals in this impact assessment, the ECO achieves delivery of heating and energy efficiency measures to low income and vulnerable households through an Affordable Warmth obligation. After closure of Warm Front in 2013, ECO is the primary mechanism through which Government is delivering energy efficiency and heating measures to low income and vulnerable households in England. In comparison to delivering these measures through a tax-funded programme, the competitive pressures in the energy supply market provide an incentive to drive down the costs of installation. These pressures should allow for more low income and vulnerable households to benefit from measures for a given level of spend.

Voluntary Approach

59. A voluntary approach working with energy companies would not provide the same confidence of future demand for solid wall insulation or that similar numbers of low income and vulnerable households would benefit from measures. Energy companies would not have an incentive, in the absence of the penalties for failing to meet their obligation, to provide upfront subsidy or promote solid wall insulation. Installers would have reduced confidence in future demand, slowing investment in the supply chain. This would in turn have a negative impact on carbon savings and addressing fuel poverty.

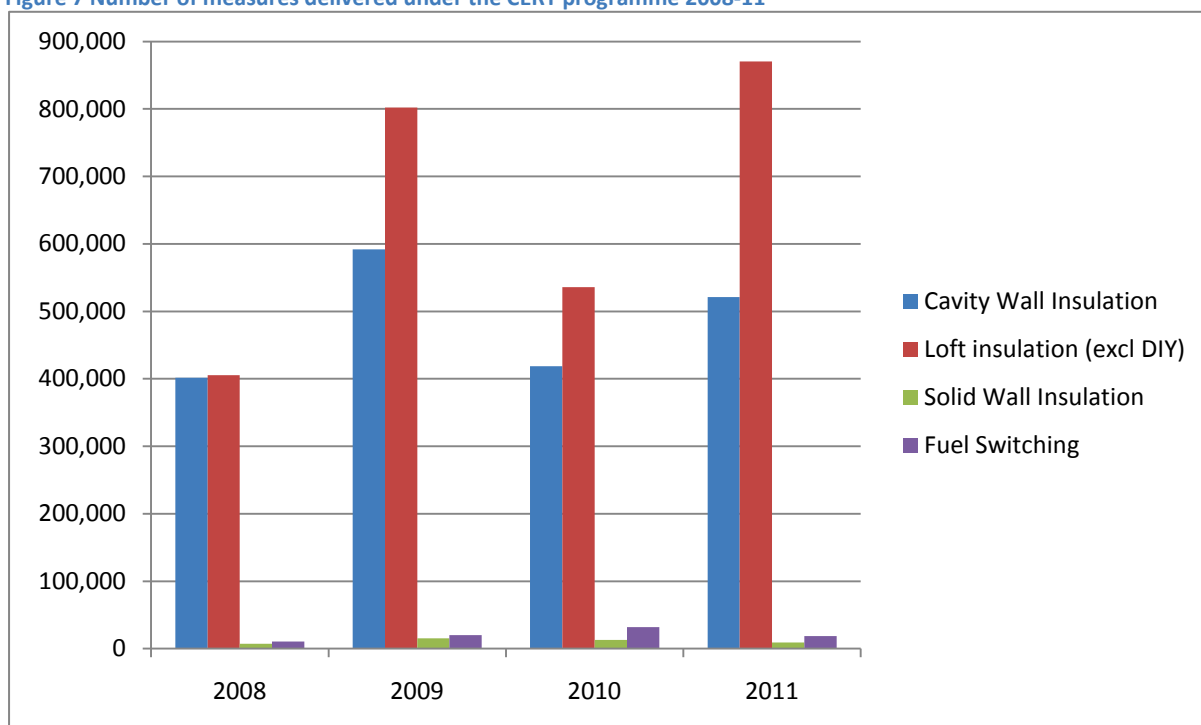
4. Background on Current Policies and Energy Efficiency Market

4.1 Current government policies

Domestic Sector

60. In the domestic sector, the current major schemes to improve energy efficiency and support low income and vulnerable households to heat their homes will end within the next 12 months. The Carbon Emission Reduction Target (CERT) and Community Energy Savings Programme (CESP) end in December 2012, and Warm Front ends in March 2013. Warm Front, CERT and CESP have been responsible for substantially increasing the deployment of energy efficiency measures.
61. Under CERT, suppliers must promote (e.g. by marketing and/or through subsidy) measures to domestic energy users which can be proven to reduce households' carbon footprint through increased energy efficiency or reduced energy demand. Failure to meet the obligation would result in a large penalty. A minimum percentage of the carbon saving obligation have to be achieved in a priority group of vulnerable and low-income households, and within that a super priority group of households thought to be at greatest risk from fuel poverty³³. Under the extension to CERT, at least 68% of the carbon savings must be achieved through professionally installed insulation measures. Suppliers are able to generate credit for carbon savings from DIY insulation by subsidising the sale of insulation materials through DIY outlets.

Figure 7 Number of measures delivered under the CERT programme 2008-11



³³ More detail on the priority and super priority group can be found in the CERT extension IA: <http://www.decc.gov.uk/assets/decc/consultations/certextension/121-iacertextension.pdf>

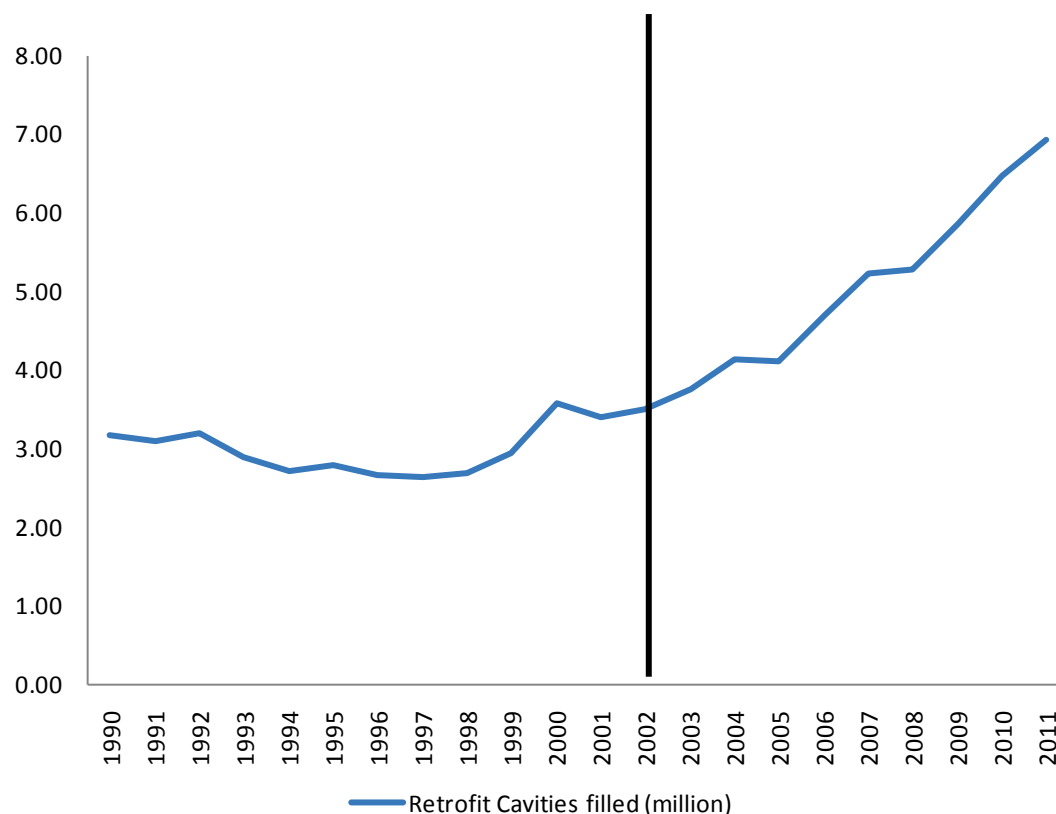
62. CESP³⁴ is a statutory carbon based obligation on energy suppliers and generators targeted at low income areas across GB. It is designed to deliver whole house retrofits on a street by street basis, particularly tackling hard to treat homes and especially incentivises the installation of more costly measures such as solid wall insulation. CESP, has the twin objectives of significantly reducing the fuel bills of some of those living in deprived areas and contributing to the improvement of the energy efficiency of the existing housing stock to reduce the UK's CO₂ emissions. The scheme is being run as a pilot (it is a relatively small scheme compared to CERT) and is intended to inform future household energy efficiency policy.
63. DECC has undertaken independent interim evaluations of CERT and CESP, which have provided part of the evidence base to inform the development of the ECO. The evaluations support the view that the policies are responsible for most of the take up of domestic insulation measures³⁵.
- Interviews with energy suppliers in the CERT/CESP evaluation³⁶ suggests that most of the major energy suppliers would not have delivered energy efficiency measures at all without CERT. Others felt they might have done so on a smaller scale.
 - The research suggests that CERT has successfully driven cost-effective delivery of relatively low-cost energy efficiency measures (especially loft and cavity wall insulation) and led to increased capacity in the supply chain.
 - There was consensus amongst delivery stakeholders that the CERT subsidy from energy suppliers was highly significant in driving the market for loft and cavity wall insulation, with an expectation amongst many consumers for free or cheap measures. Consequently, there was an associated concern amongst delivery stakeholders that demand for these measures would decrease drastically in response to a change or stopping the policy. The ECO and Green deal should minimise the negative impact of the transition from CERT. Details of this analysis is presented in Annex H.
64. In the counterfactual to the Green Deal and the ECO used for this impact assessment, CERT and CESP finish and there is no further policy intervention. This counterfactual is developed in section 6 below. Without further policy intervention, the installation rate of domestic insulation measures are projected to collapse. Data on the number of filled retrofit cavities show a marked increase following the introduction of large scale obligations on energy suppliers in 2002.

³⁴ <http://www.decc.gov.uk/en/content/cms/consultations/open/cesp/cesp.aspx>

³⁵ Evaluation synthesis of energy supplier obligation policies, DECC, 2011, <http://www.decc.gov.uk/assets/decc/11/funding-support/3340-evaluation-synthesis-of-energy-supplier-obligation.pdf>

³⁶ Evaluation synthesis of energy supplier obligation policies, DECC, 2011, <http://www.decc.gov.uk/assets/decc/11/funding-support/3340-evaluation-synthesis-of-energy-supplier-obligation.pdf>

Figure 8: Number of retrofit cavities filled³⁷



Non-Domestic Sector

65. The Green Deal market will cover the domestic and the non-domestic sector, whilst ECO subsidy will only be available for the domestic sector. For the purpose of this assessment, separate models for the domestic and non-domestic sectors are used (see section 5).
66. In the non-domestic sector, the current major schemes to improve the energy efficiency of the non-domestic building stock, such as the Carbon Reduction Commitment energy efficiency scheme, would continue after the start date for the Green Deal. However these non-domestic schemes have incomplete coverage and incompletely address barriers and market failures which reduce take-up of cost-effective energy efficiency measures in the non-domestic sector.

Policies covering domestic and non-domestic sectors

67. In addition to overarching policies targeting energy efficiency, for both the domestic and non-domestic sectors there are a number of policies that covers both sectors that must be accounted for when considering the impact of the Green Deal and the ECO policy package. Such policies include the roll-out of smart meters, building regulations, products policy (including mandatory minimum standards of energy efficiency for energy using products), energy taxation (such as the Climate Change Levy), the Renewable Heat Incentive and Feed in Tariffs. These policies can target the same energy efficiency measures as the Green Deal and the ECO, reduce demand for energy services or reduce the carbon intensity of energy supply

³⁷ Source: Department of Energy and Climate Change

thereby reducing emissions savings from energy efficiency measures. These policies are accounted for in the generation of the counterfactual (see section 6). Policies may also work together with the Green Deal to drive take up of measures if the Green Deal is used to finance energy efficiency measures that would have otherwise been financed using another route. There may also be synergies for the Green Deal when awareness of these other policies is raised.

4.2 Domestic building energy efficiency market

68. The market for energy efficiency measures in the domestic residential sector has been boosted by the supplier-led policies (highlighted above). The overall market size in 2007 was estimated at £8.25bn³⁸, mainly attributable to double glazing, insulation, boiler replacement and wet appliances. Heat controls, efficient lighting and micro-generation accounted for the smallest share. Figures from 2009 to 2011 on some sub-sectors of this market are presented in the table, below.

Table 4: Market size of domestic energy efficiency measures

Measure	Market Size (£bn) ^[1]	Installations p.a.	Year
Lighting	0.6	81.6m	2010
Space and Water Heating	0.7	1.5m	2010
Doors and Windows	1.9	3.7m	2009
Ventilation and Air Conditioning	0.9	1.5m	2009
Heat Pumps	0.07	6,700	2010
Insulation	£0.7bn ^[2]	1.6m ^[3]	2010/2011
Solar Thermal	n/a	20,000	2010
Biomass	n/a	2,060	2010
Draught Proofing	n/a	26,000	2010

69. Within the insulation market, the majority of work is in filling lofts and cavity walls, which was the main focus of energy suppliers in order to comply with the CERT-related measures. There were around 870,000 lofts (excluding DIY), 520,000 cavity walls and 10,000 solid walls insulated during 2011 under CERT. This compares to around 540,000 lofts (excluding DIY), 420,000 cavities and 13,000 solid walls over the preceding year under CERT.

³⁸ Source: *Assessment of the Size of the UK Household Energy Efficiency Market*; Element Energy Ltd and Quantum Strategy & Technology Ltd; November 2008

^[1] Source: AMA research (www.amaresearch.co.uk, reports of various dates) and *Assessment of the Size of the UK Household Energy Efficiency Market*; Element Energy Ltd and Quantum Strategy & Technology Ltd; November 2008. The methodologies used in these two studies are different.

^[2] This market size includes measures delivered under CERT, CESP, warm front, in new build properties and the DIY market.

^[3] Source: Statistical release: Estimates of home insulation levels in Great Britain - October 2011 (<http://www.decc.gov.uk/assets/decc/11/stats/energy/energy-efficiency/3780-stat-release-home-insulation-oct11.pdf>)

70. The market is estimated to support around 75,000 manufacturing jobs³⁸, the majority of which are in the manufacture of glass and double glazed windows and doors, not traditionally associated with the insulation market. For the insulation market, it is difficult to assess the number of jobs supported because many energy efficiency measures may be installed as part of larger renovation or extension projects. A particular proportion of domestic construction jobs cannot easily be attributed to energy efficiency. Specialist construction skills are not required to install windows and energy efficient boilers typically have the same installation process as inefficient ones. Estimates suggest around 4,700 installers³⁹ were employed in the insulation market in 2007/8, which covers loft and wall insulation, and another 22,000 are employed in the wider supply chain.

Financing of measures

71. The modelling of Green Deal finance assumes everyone accepting SWI, CWI or LI following a Green Deal assessment uses Green Deal finance to pay for it. Clearly there are uncertainties around this as different people will have different payment options available to them; some may choose to pay up-front and others may prefer alternative forms of finance.
72. The central reason for our assumption is that the choice experiment on which Green Deal finance volumes are based should filter out people who choose to pay via other methods. This is because the details of the Green Deal were fully explained to respondents prior to their decision on whether to take out a plan. So when they accepted they should have been making a decision not just on whether to take a measure but also on whether to use the Green Deal rather than other payment methods.
73. To reflect the uncertainty though, we also model high and low scenarios. The low scenario reflects the fact that a quarter of those who accepted a Green Deal also expressed a preference for paying up-front in a separate question. In addition, evidence from the current market for energy efficiency and home improvement products suggests paying up-front may be a favoured option for a proportion of people, particularly when the (post-subsidy) cost of the product is small⁴⁰. To reflect this, the low finance scenario assumes that 50% of easy to

³⁹ Source: *Low Carbon and Environmental Goods and Services: an Industry Analysis*; Innovas; 2009

⁴⁰ A DECC survey found that 13% of those who bought an energy efficiency or home improvement product in the past 12 months paid using finance with most saying they paid up-front. Asked to consider a hypothetical (non-GD) purchase of £500, only 9% said they would use finance. This rose to 30% when the cost was £5,000. These results are broadly consistent with other UK and US evidence, see http://www.oft.gov.uk/shared_oftr/reports/consumer_credit/oft1150.pdf and http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/n03-1_martin.pdf. It is important to note then, that the survey in which the GD was fully explained resulted in a far higher proportion of people (75%) expressing a preference for (GD) finance than in the current market. This reflects the impact that the GD could have. Indeed, a strong reason why people may be rejecting finance options currently is that, as an Energy Saving Trust report concluded: “there is no significant loan infrastructure in the UK targeted on financing carbon saving measures.”

treat CWI (the cheapest measure predicted to generate significant levels of finance) is paid for up-front rather than using Green Deal finance.

74. The high scenario reflects the fact that if people are willing to pay for measures up-front once they fully understand the long term benefits, some other modelling assumptions look very conservative. For example, the model automatically strips out households that don't meet the Golden Rule⁴¹ but if some consumers are prepared to pay a proportion of costs up-front this would unlock more opportunities for Green Deal finance. This could be particularly true for packages including measures – like boilers – for which customers are used to paying an up-front cost. Business models provided by key providers predict far higher levels of Green Deal finance from these types of packages than is projected by the GDHM. Hence our high scenario doubles the number of boiler upgrades that use Green Deal finance to reflect this (see Annex B for more).

4.3 Non-domestic building energy efficiency market

75. It is difficult to assess the current size of the non-domestic buildings' energy efficiency market because there are no delivery policies from which installation statistics are available. However, there are known trigger points where energy efficiency measures are taken up, or when the market is more likely to take steps to improve their premises' energy efficiency. These trigger points are:
- Breaks in tenancy agreements;
 - Consequential improvements: the 2010 Building Regulations state that if a property over 1000m² is being extended, or a fixed building service is being installed or its capacity increased, then the energy efficiency of the rest of the property must be brought in line with the current Building Regulations standards (consequential improvements). This creates a market for energy efficiency improvements on the existing building stock; and
 - Major refurbishment: buildings undergo a major refurbishment every 25 years or so⁴².
76. There are organisations whose core business covers delivering energy efficiency measures into non-domestic buildings while guaranteeing costs or energy savings. These include energy service companies (ESCOs), those delivering energy performance contracts and guaranteed energy savings.

Financing of measures

77. The methods of financing energy efficiency measures will depend on a number of factors, such as their size and sector. The choices available include the following:
- self-financed from cash reserves;
 - financed through existing borrowing channels; or
 - financed through a new borrowing channel, often introduced or arranged via an ESCO.

⁴¹ Given the repayment periods assumed in the model.

⁴² Duration recommended by the Department of Communities and Local Government

78. For organisations that invest in energy efficiency measures, they are most commonly financed through organisations' cash reserves⁴³, as they are often viewed as low risk, high return investments. Larger organisations will typically have more ready access to finance, either from cash reserves or borrowing, and have greater competencies in the area of financing capital projects, than smaller organisations. This market will also attract ESCOs, who concentrate on projects sufficiently large to achieve economies of scale. For smaller organisations, financing projects outside their core business area is more challenging and they are also less able to attract ESCO-type organisations' business because of their size.
79. Many large retail organisations self-fund energy efficiency measures because of their strong cash position and are more engaged in energy efficiency than smaller retailers.
80. The UK's large commercial office market is less engaged in energy efficiency than in some markets, such as Australia, where landlords compete to make their buildings more energy efficient than their competitors'. There is also little ESCO activity in this market because of the split incentives between tenants and landlords. Nevertheless, some landlords are starting to see the value in making their buildings' common areas more energy efficient. These projects are typically self-financed. There are also emerging models to address the split incentives barrier, such as Green Leases, and managed energy service agreements where tenants sign up to energy management contracts that benefit them and are financed by them.
81. More energy intensive organisations, such as IT data centres and industrial plants, are more engaged in energy efficiency because energy makes up much more of their operating costs. Being core to their business means that many of these measures are self-financed but, owing to their complexity, they have a limited attraction for external finance providers.

⁴³ Steven Fawkes, DECC adviser; and DECC's non-domestic Green Deal Business survey, which showed that 65% of respondents with responsibility for energy efficiency would use cash to pay for energy efficiency improvements.

5. Analytical Approach

82. To estimate the impact of the Green Deal and the ECO, the projected take up of energy efficiency and heating measures with the policies acting is compared to the projected take up if the policies were not introduced. Three models have been used. In the domestic sector, the Green Deal Household Model (GDHM) has been used to model the carbon target element of the ECO and the introduction of the Green Deal mechanism in the domestic sector. The GDHM is not an appropriate tool to optimise the Rural Safeguard element of the ECO. Therefore, whilst the overarching CSC target and the CSO target is set by modelling optimisation, the Rural Safeguard target has been estimated by pro-rating 15% of the overall Carbon Saving Communities carbon target. The Affordable Warmth target has been modelled separately. Finally, a third model has been used to estimate the take up of energy efficiency measures in the non-domestic sector because of the Green Deal. Each of these models is described in turn.

5.1. The Green Deal Household Model

83. The ability of models to fully capture the likely uptake of measures is limited, given the innovative and open market characteristics of the Green Deal and ECO policy framework. The Green Deal will enable the development of new business models and delivery systems, therefore predicting the uptake of Green Deals in the market is inherently difficult (see section 7.1 for detailed discussion).
84. The Green Deal Household Model (GDHM) provides projections for the take up of the three most significant domestic insulation measures – loft, cavity and solid wall insulation. These measures are projected to deliver the overwhelming majority of the carbon savings to meet the ECO's carbon target. Other eligible measures have also been assessed and linked to the GDHM to provide a more comprehensive projection of take up of measures under the Green Deal and the extent to which measures packaged with wall insulation will generate ECO points.

Domestic sector technical potential

85. Table 5 presents the remaining technical potential for energy efficiency improvements in domestic sector buildings. These estimate are based on results from the English House Condition Survey⁴⁴, adjusted to account for the impact of existing government policies which will be operating until December 2012. The potential market size represented by this remaining potential is vast; the total capital cost of all the remaining technical potential in 2013 is estimated to be £58bn, of which low cost cavity wall and loft insulation makes up only £2.2bn.

Table 5: Domestic sector technical potential

	Technical potential
Solid Wall insulation	6.9m
Cavity wall insulation – easy to treat	2.6m
Cavity wall insulation – hard to treat	3.2m
Top-up loft insulation	5.7m (of which 0.2m virgin loft)

⁴⁴ Reference to be inserted

Floor insulation	3.0m
Non-condensing gas boiler to condensing gas boiler	Roughly 12m non-condensing boilers remain in UK housing stock
Glazing	2m ⁴⁵ single glazed properties

86. The assessment of the potential for measures to be part of a Green Deal finance package, or to be part of a package of measures generating ECO points is provided in Annex B. The assessment considers a range of factors, including past sales, the level of energy savings the measures achieve, the proportion of the cost of installation that can be Green Deal financed and the level of ECO subsidy they attract when installed alongside solid wall or hard to treat cavity wall insulation. In a number of cases, in particular for innovative measures, there is uncertainty over the effectiveness of measures and how their costs will evolve. Projections for these measures are particularly uncertain, but the Green Deal will include flexible systems that will enable and encourage the development of new energy efficiency products.

Cost effectiveness of technical potential

87. The marginal abatement cost curves (MACCs), below, show the cost-effectiveness of the major insulation measures in 2013 and 2020. Using a static comparison, around 3.8 MtCO₂e is cost effective⁴⁶ in 2013. By 2020, this is expected to have increased to around 4.5 MtCO₂e as a consequence of falling installation costs owing to learning and economies of scale, the expected increase in fossil fuel prices and higher cost of a tonne of CO₂ (shown in dashes).

88. The MACCs show that the most cost effective insulation measure in both 2013 and 2020 is easy to treat cavity wall insulation. They also show that the cost effectiveness of solid wall insulation varies substantially depending on the house type it is being installed in and whether the insulation is applied internally or externally. Under the ECO, suppliers would seek to minimise their costs of meeting their obligation which would largely be determined by the subsidy to householders. It could be expected that to drive demand for measures, the subsidy per tCO₂ saved would be lower for more cost-effective solid wall insulation measures, ensuring that the ECO would drive the installation of the more cost-effective opportunities. A static comparison to DECC/HMG carbon values, particularly in 2013, shows that a substantial proportion of the Solid Wall insulation potential is cost-ineffective.

89. The static comparison of cost-effectiveness should be complemented by dynamic considerations and awareness of how the cost-effective benchmarks for Government appraisal were generated. The policy package could be expected to improve the cost-effectiveness of solid wall insulation in future time periods through learning by doing and induced innovation (see section 4.1.4). The MACCs shown in Figure 12 and Figure 13 show that by 2020 more solid wall insulation is cost-effective – this is partly a result of an assumption of higher energy prices in 2020, but also reductions in the cost of solid wall insulation over time.

⁴⁵ England only – to be updated

⁴⁶ Cost effectiveness defined as being at or below the non-traded cost of carbon of £57/tCO₂ in 2013 and £63/tCO₂ in 2020. See Table 18 in Annex A for more information.

90. In addition, the carbon values were derived using a target-consistent approach in 2009. This target-consistent approach used MACCs developed by the Committee on Climate Change to estimate the marginal cost of meeting the UK's carbon budgets. The MACCs included a substantial abatement potential from Solid Wall Insulation which was below the marginal cost. Updating our view of the cost-effectiveness of SWI, increasing the cost per tonne, would increase the estimate of the marginal cost of meeting carbon budgets were the target-consistent analysis revisited. The relative cost-effectiveness of SWI should also be considered with respect to the latest evidence on the cost-effectiveness of other abatement measures across the economy.

Figure 9: Marginal abatement cost curve for domestic sector insulation measures: 2013

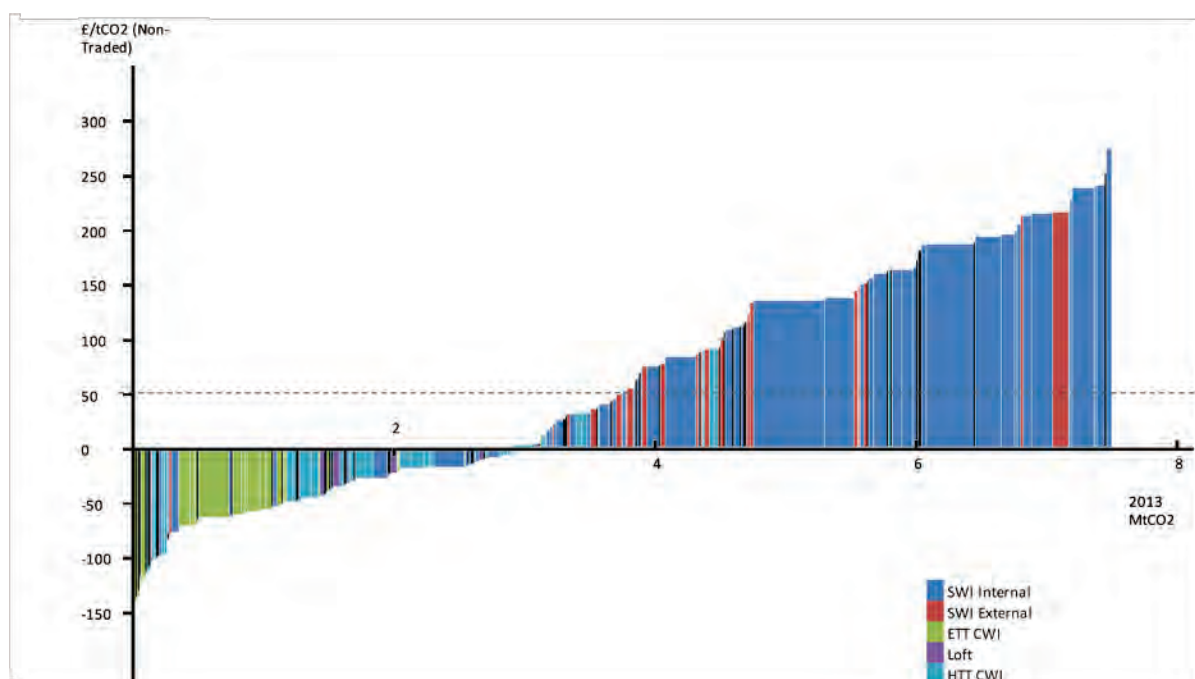
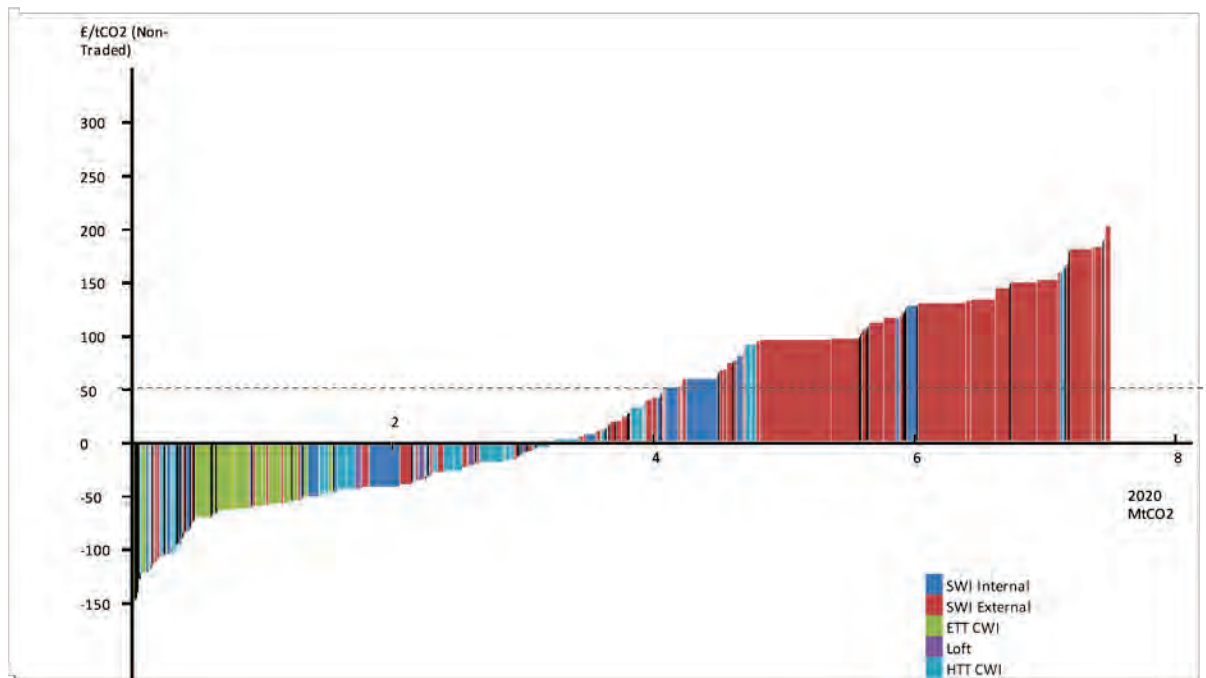


Figure 10: Marginal abatement cost curve for domestic sector insulation measures: 2020



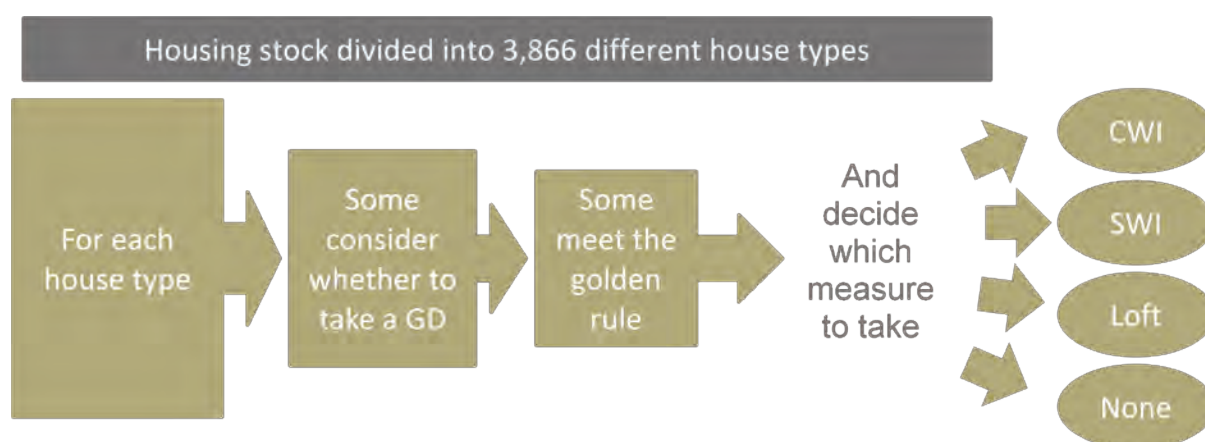
Estimating uptake of domestic insulation measures

91. The GDHM is a housing stock model that simulates the uptake of energy efficiency measure each year. The steps are:

- The British housing stock is divided into 3,866 house types which reflect permutations of size, heating fuel, tenure and existing level of loft and wall insulation.⁴⁷
- The characteristics of the different properties determine which measure they are eligible for and what the costs and energy savings would be.
- Each year a certain number of households consider taking out a Green Deal.
- The GDHM uses consumer preferences derived from the Green Deal survey to estimate the probability that each of these household takes up a measure.
- Only measures that meet the golden rule without any additional or upfront payment by the consumer are taken up.
- The probability of uptake is determined by the net bill savings (bill saving minus repayments), the level of upfront capital and assessment cost, the length of the Green Deal plan and the type of measure offered. The net bill savings are determined by energy prices, cost of measures, the interest rate of the Green Deal plan and the amount of ECO subsidy available.
- The probability that a house type will take up a measure is multiplied by the stock of houses it represents to provide an estimate of total uptake.

⁴⁷ Based on English, Scottish and Welsh house condition surveys.

Figure 11: Modelling take up in the Green Deal Household Model



92. The consumer preferences incorporate the additional ‘hidden’ costs associated with energy efficiency measures, such as the hassle cost of householders having to spend time working with Green Deal assessor and installers. Green Deal survey participants were also given a description of the key elements of the Green Deal Mechanism (energy efficiency measures would be installed at no upfront cost and repayments would be attached to the properties energy meter). The consumer preference therefore also reflect consumer attitude to the new finance mechanism, at the point at which the survey was carried out.

93. The analysis is based on the assumption that energy companies optimise their subsidy spending to meet their carbon target obligation at lowest cost, and that the total costs passed through to consumers is based on the marginal subsidy cost of the last measure required to meet the target multiplied by the size of the obligation (see section 9 for further details). The input assumptions are fully set out in Annex A and a more detailed explanation of how the model works is provided in Annex B.

Box 1: Estimating Green Deal demand from consumer surveys

The domestic sector uptake estimates presented in this impact assessment are based on the Green Deal consumer survey. This was a survey of 2,023 homeowners and private tenants in Great Britain which explored the impact of different aspect of the Green deal offer on consumer demand. The Green Deal is a market-based mechanism: market participants will drive product and service innovation, marketing, packaging and cross-selling. This environment is impossible to replicate in a research environment and so estimated demand figures must be seen within this context.

Respondents were asked to make a choice between a number of Green Deal packages with varying attributes, such as the type of energy efficiency measure, the cost of an assessment or the net savings. Respondents traded off these attributes against each other, and indicated their preference. This information was used by Element Energy and Cambridge Architectural Research to estimate the probability that an individual household would take up a Green Deal, and how this varied depending on the package offered.

The survey respondents were provided with a detailed explanation of the consumer journey that covered the accredited assessment, accredited installation, the different measures available and how the new finance mechanism would work. The consumer behaviour in the GDHM is based on the results of the choice experiment within the Green Deal consumer survey. It therefore reflects not

only the financial benefits of the packages of measures but also consumers' perceptions of hidden costs, preferences for particular measures and attitudes to the finance mechanism itself.

There is inherently a degree of uncertainty involved when using a stated preference survey to estimate demand from the population as a whole. The results of the model have therefore been compared against evidence from the evaluation of existing pilots and trials. These show that the demand estimates are broadly consistent with what has been observed in practice.

5.2. The Affordable Warmth Model

94. The Affordable Warmth obligation is modelled separately from the ECO carbon target, although there are some interactions between the Green Deal and Affordable Warmth models.
95. Information about the number of opportunities to install new heating systems and low-cost (i.e., loft and cavity-wall) insulation within the Affordable Warmth eligible group is based on data from the English Housing Survey, Scottish House Condition Survey and Living in Wales Survey. The stock of insulation in the Affordable Warmth model is adjusted downwards to reflect number of insulation measures that are assumed to be installed through the Green Deal carbon obligation. The *flow* of replacement heating systems within the Affordable Warmth eligible group is based on assumptions about the rate of breakdown of boilers. It is assumed that a standard boiler has a lifetime of 12 years - it can therefore reasonably and conservatively be expected that the one in fourteen boilers within the eligible group breakdown each year. This information is combined with data on: (1) SAP-based information on the impact that heating and insulation measures will have on notional energy bills; and (2) the delivery cost of different measures, in order to construct a supply curve for Affordable Warmth compliance.
96. The modelling assumes that suppliers and installers will, where possible, deliver packages of measures whilst they have access to a property. For example, whilst a new heating system is being installed in a dwelling with no loft insulation, then it is assumed that both measures will be installed. As such the supply curve ranks all heating and insulation *packages* in cost effective order. This is a departure from the methodology in the consultation impact assessment where it was assumed that measures would be delivered in a strict order of cost effectiveness (i.e., where a particular dwelling had a number of opportunities to install measures, an energy supplier will only install the most cost effective measures within that package). Naturally, this lowers the overall NPV of the policy (as fewer of the most cost-effective measures are delivered). However, it is believed that this is a better approximation of actual delivery patterns. The supply curve is recalculated each year as measures are installed in the modelling.
97. A full description of the Affordable Warmth model, including all of the underlying assumptions, are provided in Annex D.

5.3. Non-domestic Sector Model

98. Two modelling tools have been adopted in the non-domestic sector to analyse the impacts of the Green Deal and the potential savings from supporting policy in the Private Rented Sector (PRS) respectively. More comprehensive details on the modelling undertaken in the non-domestic sector may be found in Annex C.
99. For the voluntary aspect of the Green Deal, a stock of energy efficiency opportunities has been identified using information from the Non-Domestic Buildings Energy and Emissions Model (N-DEEM). This has been supplemented with insights on possible options for bundles of Green Deal measures that can be installed in specific building types. This additional information has been adapted from work undertaken by the Carbon Trust/AEA as described in Annex C. The take-up of these bundles is assessed based on a consideration of the decision-making process that a potential Green Deal consumer might go through based on evidence from the Green Deal Business Survey⁴⁸. Combining the decision-making analysis with the stock of energy-efficiency measures available in the cross-section of non-domestic buildings, it is possible to obtain projections of the take-up as a result of the Green Deal.
100. The impact of supporting policy in the private rental sector (PRS) has been assessed in the context of lifting all buildings with an F or G- rating on their Energy Performance Certificate (EPC) to an E-rating, whilst accounting for the barriers that may prevent this being universally applied. The Carbon Trust's analysis⁴⁹ forms the basis of the assessment of these impacts. The analysis has been extended by considering the take-up as a result of existing policy (to avoid double-counting), and the proportion of this potential that would not be deliverable, be it as a result of exemptions or other limiting factors. The take-up profile has been linked to the distribution of lease periods in the PRS. This approach assumes that the signing of new leases forms the primary determinant of when measures are installed.
101. In order to estimate the number of Green Deal packages taken out, an estimate of the average size of a Green Deal is estimated. This uses data on the number of premises likely to be EPC rated F or G in the PRS, along with the capital values estimated from the PRS estimates, above. Based on expected annual take up rates, this gives an average size of Green Deal in the PRS sector, which is then applied to the other areas of the sector that take out Green Deal packages.

⁴⁸ The Green Deal Business Survey will be published alongside the Government Response.
http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

⁴⁹ Presented in the report "Building the Future Today"
<http://www.carbontrust.co.uk/Publications/pages/publicationdetail.aspx?id=CTC766>

6. Counterfactual

6.1 Domestic counterfactual

102. Estimating the likely impact of the Green Deal and Energy Company Obligation (ECO) requires an assessment of what would occur in the absence of the policies. This counterfactual or Business As Usual (BAU) scenario forms the starting point for analysis of the impacts. There are a number of factors that would affect the uptake of measure in the absence of the policy package. The BAU take-up of energy efficiency opportunities is driven by:
- policy that would be present in the absence of the Green Deal and ECO;
 - potential remaining after the impacts of current energy efficiency policies (CERT and CESP) ending in 2012
 - behaviour trends and changes in awareness;
 - technological progress, with new energy efficiency products available, and changing costs of measures; and
 - energy prices, which are expected to rise over the period in real terms.
103. Sales of domestic sector energy efficiency measures in the counterfactual are projected to be much lower than historic sales. For the past decade the market has been driven by high levels of subsidy provided through the CERT, CESP and EEC policy interventions. By comparison, the BAU scenario is based on a market in which these policies end, and no further policies are implemented to replace them. CWI sales between 1990 and 2002 (when EEC was introduced) averaged around 200,000 per year⁵⁰ (of which around 180,000 were new build)⁵¹. Uptake in the BAU may be higher than this given real energy prices have since risen 2002. On the other hand there is now considerably less potential for CWI within the housing stock. 67% of all cavities will have been insulated by 2013 and 58% of the remaining potential is hard to treat or untreatable, which are unlikely to be insulated without government intervention. There is less data on uptake of SWI. Known uptake during 2011 was around 22,000, driven by CERT and CESP.
104. The GDHM has been used to project forwards the counterfactual for these measures assuming there is no marketing by energy companies or Green deal providers and consumers receive no subsidy. The details of this scenario are set out in annex B and the result are summarised in Table 4. The table also shows historic uptake rates for SWI, CWI and LI to illustrate the impact of current policy (CERT and CESP). The analysis of the counterfactual also included an adjustment to consumer demand to account for the lower levels of marketing and other sales activity that would result from the Green Deal not being implemented. Our modelling assumes that the number of boilers installed under the Green Deal and ECO framework is the same as it would be in BAU, but that some of these are now paid for using Green Deal finance. In other words, relative to the counterfactual, we assume the policy

⁵⁰ *Energy consumption in the UK:2011, table 3.15b*

⁵¹ CLG House Building statistics:

<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/housebuilding/livetables/>

framework does not generate additional uptake of these measures, but does generate additional Green Deal finance. This is set out in annex B.

Table 6: BAU take up of major insulation measures

	Annual average uptake in BAU (no existing or new policy)	Annual uptake to April 2011 (existing policy) ⁵²
SWI	700	22,000 ⁵³
CWI	42,000	590,000
LI (virgin and top-up)	21,000	1,000,000
Draft proofing and glazing (packaged with wall insulation)	3,200	No Data Available
Floor insulation (packaged with wall insulation)	100	No Data Available

105. The modelling on the Affordable Warmth obligation is expected to deliver predominantly new and replacement heating systems and insulation measures. Measures are targeted at low-income households (in receipt of certain 'passport benefits'⁵⁴) in private housing tenures. The heating and insulation measures that will be delivered will require significant capital outlays and it is assumed that this is beyond the means of households within the target group. As such, it is assumed that the measures delivered by the obligation are 100% additional.

6.2 Non-domestic counterfactual

106. Business-as-usual take-up rates will depend on the abatement opportunities, underlying market-driven take-up, and the effect of other policy interventions.

107. The remaining abatement opportunities in the current building stock is modelled to give an estimate take-up of the potential stock of energy efficiency opportunities (see Figure 12 and Figure 13, below). The methodology for this is described in more detail in Annex E. The BAU take-up of opportunities are accounted for in two steps: first, account is taken of the take-up achieved under a pre-Energy White Paper (EWP) 2007⁵⁵ policy mix; and second adjustments are made for policy that has been implemented since then (see Annex C for details of how this is modelled). This delivers an estimate of the remaining energy efficiency potential of 19TWh between 2013 and 2022, a proportion of which could potentially be delivered by the Green Deal.

⁵² No data available on uptake of draft proofing and glazing package with wall insulation.

⁵³ Figures for the full calendar year of 2011.

⁵⁴ A means tested state benefit, such as Pension Credit. Receipt of certain passport benefits make a household eligible for support under the Affordable Warmth target.

⁵⁵ http://www.decc.gov.uk/en/content/cms/legislation/white_papers/white_paper_07/white_paper_07.aspx

Figure 12: Non-Domestic Sector's Potential Energy Savings

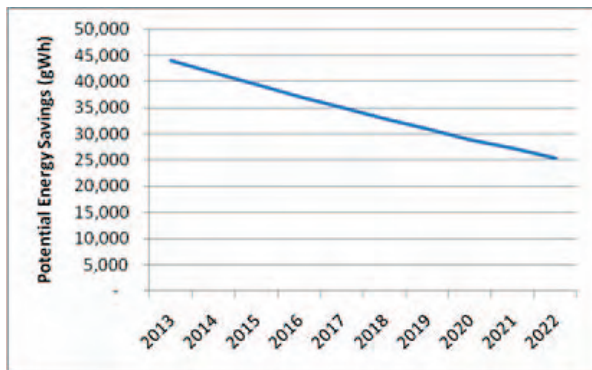
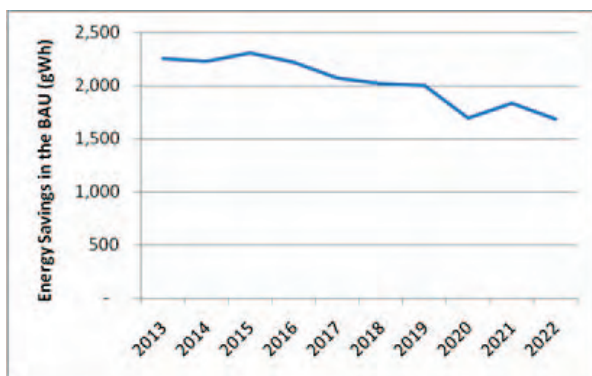


Figure 13: Non-Domestic Sector's Business As Usual Abatement



7. Aggregate Impacts

108. This section sets out the aggregate impacts of the Green Deal and ECO policy package. It covers the high-level costs and benefits of the policy, the uptake of energy efficiency measures, the carbon and energy savings delivered and the distribution of the impacts across different section of society. The central scenario set out below reflects the best estimate given current evidence.
109. There is a high level of uncertainty around the estimates presented in this section. A number of the key drivers of outcomes, such as energy prices and consumer demand for the Green Deal, are difficult to predict. The projections of uptake are primarily based on a consumer survey of 2,023 respondents and the housing stock data is based on a survey of 16,150 properties. These have been used to estimate the impact of the policy package on 26m households in GB, which inherently leads to considerable uncertainty in the results. The Green Deal is a market based mechanism, and while the ECO targets provide some certainty around the amount of carbon delivered by that policy, it is very difficult to predict how the Green Deal market will develop before the policy framework becomes operational. We have therefore conducted an extensive sensitivity analysis to illustrate the range of possible outcomes under different assumptions. The sensitivity analysis has been used to develop a high and low estimate of the impact of the policy package (see section 7.5).
110. The central estimates for the high-level aggregate impact of the Green Deal and ECO are set out in Table 7. The total benefits of the policy are estimated at £25.6bn, compared to a total cost of £17.3bn. The majority of the costs are made up of installation costs (58%) and hidden costs (20%) whilst the majority of the benefits are from energy savings (59%).

Table 7: Aggregate Impacts (£m, unless otherwise stated)

	Low scenario	Central scenario	High scenario
Installation costs	£9,088	£10,121	£10,580
Additional costs	£3,005	£3,468	£4,160
Assessment costs	£955	£1,214	£1,307
Finance costs	£847	£1,522	£1,701
Cost to businesses (excluding ECO)	£1,011	£945	£1,052
Administration costs	£40	£40	£40
Total costs	£14,946	£17,311	£18,840
Energy savings (Variable element)	£12,717	£14,988	£16,176
Comfort benefits	£2,822	£3,450	£3,749
Air quality benefits	£1,243	£1,434	£1,560
Lifetime non-traded carbon savings	£3,015	£4,272	£4,809
Lifetime EU ETS Allowance savings	£1,401	£1,471	£1,522
Total benefits	£21,198	£25,616	£27,817
Net Present Value	£6,252	£8,305	£8,977
Equity-weighted NPV	£15,439	£20,241	£21,907
2020 Non-traded carbon savings (MtCO ₂ pa)	1.4	1.8	2.0

Life time non-traded carbon savings (MtCO ₂)	59	84	48
Cost effectiveness £/tCO₂	-£55	-£48	-£44

111. Table 8 provides a breakdown of the key impacts by Green Deal and ECO Carbon Targets, ECO Affordable Warmth Target and non-domestic Green Deal.

Table 8: Breakdown of key impacts by Green Deal and Carbon Targets, Affordable Warmth and Non-Domestic Green Deal

	Green Deal and ECO Carbon targets	ECO Affordable Warmth target	Non-domestic sector Green Deal	Total
Total costs (£m)	£13,946	£2,268	£1,097	£17,311
Total benefits (£m)	£19,484	£4,012	£2,120	£25,616
Net present value (£m)	£5,538	£1,744	£1,023	£8,305
2020 Non-traded carbon savings (Mt CO ₂)	1.76	-0.82	0.91	1.84
2020 Energy savings (TWh)	10.68	-0.68	7.08	17.08
Cost effectiveness £/tCO ₂	-£15	N/A	-£73	-£48

7.1 Uptake by measure

112. Figure 14 shows the uptake of the main domestic energy efficiency measures (excluding DIY loft insulation, which is outside the scope of the Green Deal). Uptake of cavity wall insulation is expected to decline over time as potential is used up. By comparison, uptake of solid wall insulation is expected to rise to around 100,000 p.a. in 2015. The delivery of packages of measures is expected to play a significant role in the Green Deal. Green Deal assessors will recommend a list of measure to be installed some of which will provide scope for cross subsidisation⁵⁶. Economies of scope⁵⁷ are likely to mean that packages of measures will often be a cost effective way of meeting the Carbon Target. The analysis predicts that 23% of households taking up wall insulation also top up their loft insulation, and 10% take out another energy efficiency measure as part of the package. Figure 15 compares the uptake of CWI and SWI in the high, low and central scenarios. Figure 16, Figure 17 and Figure 18 show historical uptake rates for the different insulation measures and how this compares to expected demand in 2012, the last year of CERT and CESP and 2013, the first year of the Green Deal and ECO delivering measures.

⁵⁶ Green Deal Finance raised on a measure with a low payback period could be used to part finance measures that would not otherwise meet the Golden Rule.

⁵⁷ Economies of scope are reductions in average cost arising from the production or sale of a number of different products

Figure 14: Uptake of main insulation measures in the domestic sector

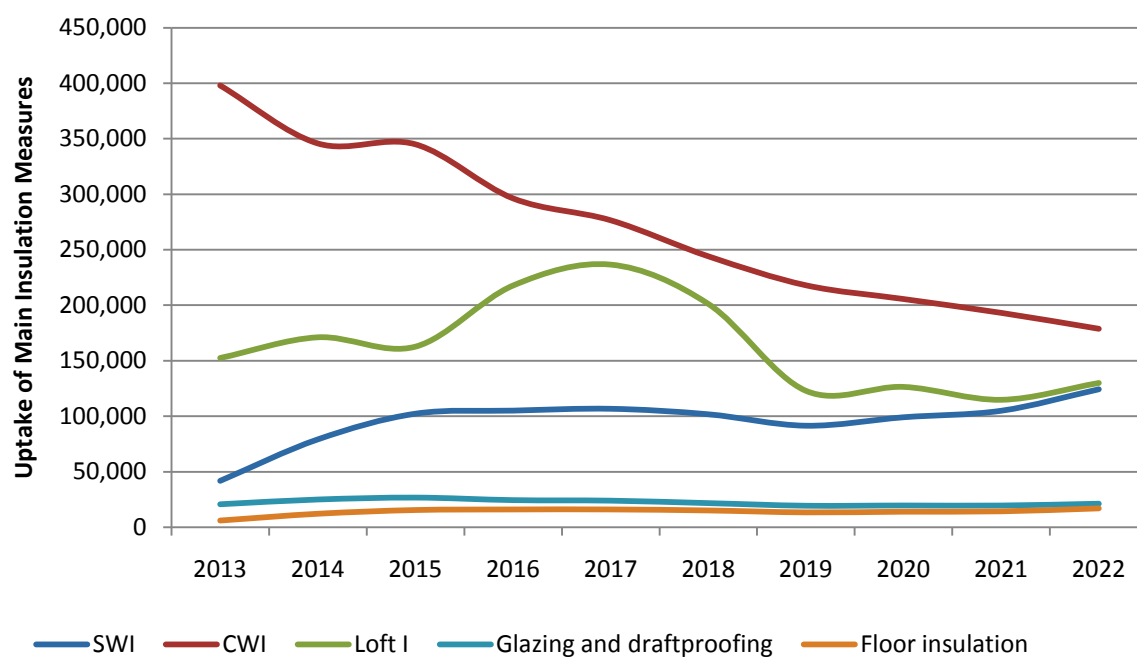


Figure 15: Uptake of wall insulation in central, low and high scenarios

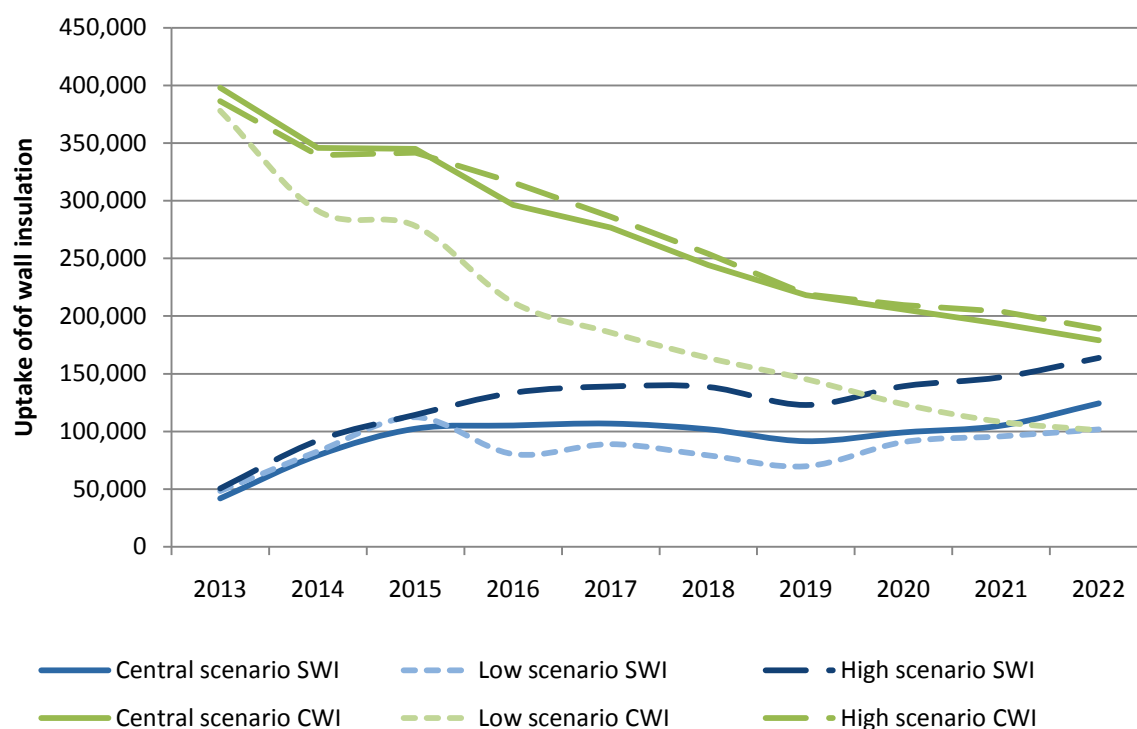


Figure 16: Historical and estimated 2012 and 2013 take-up of CWI

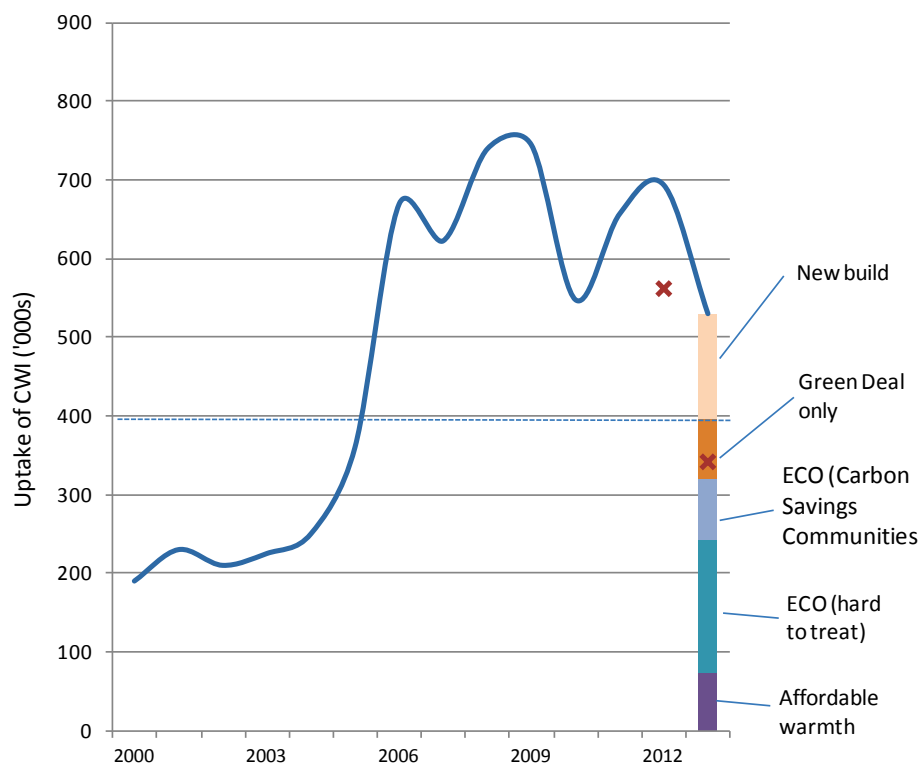


Figure 17: Historical and estimated 2012 and 2013 take-up of LI

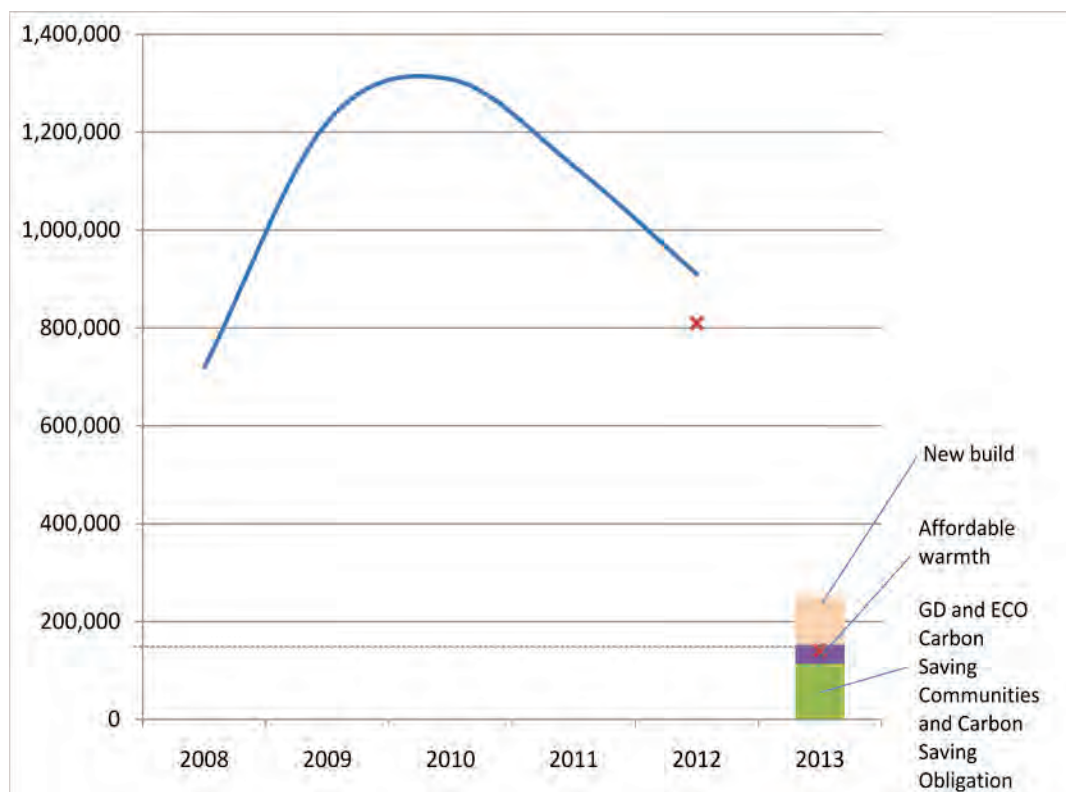
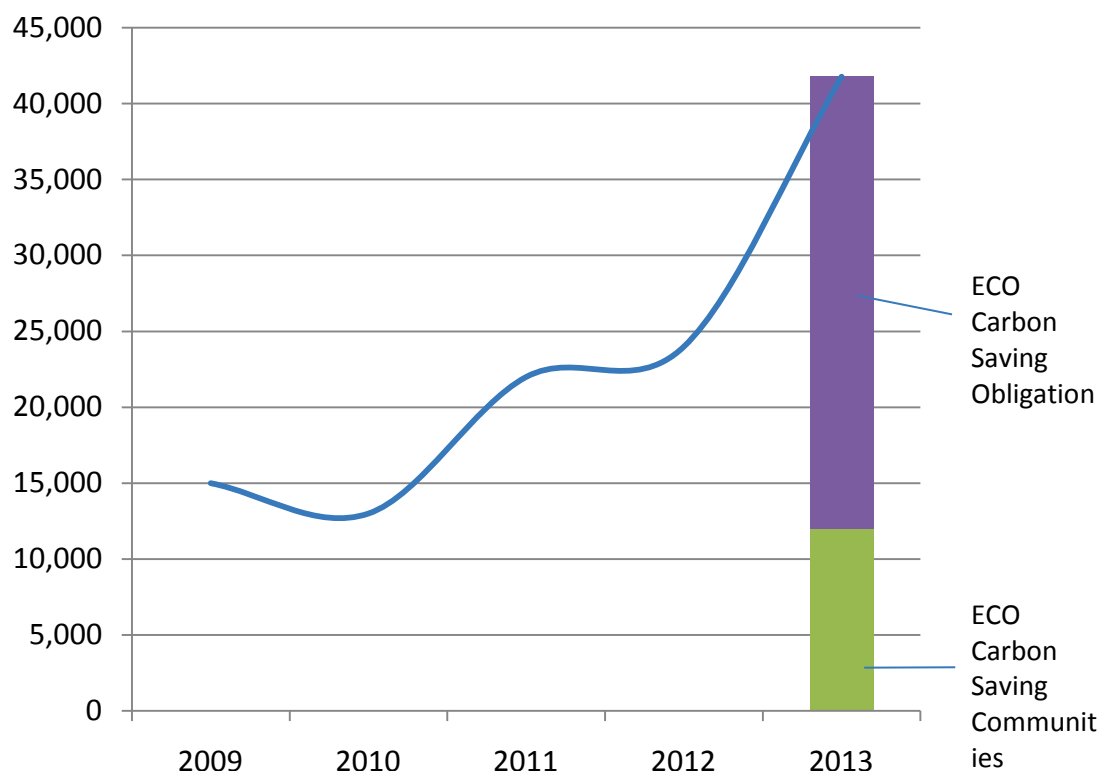


Figure 18: Historical and estimated 2012 and 2013 take-up of SWI



Box 2: The New Green Deal Market

This impact assessment's estimates for the size of the Green Deal market and take-up are based on the evidence in which government has most confidence. In the housing market, this gives a view of demand based on the level of the ECO obligations and the number of measures that will be required to meet them and, outside of the scope of the ECO, the regulation of the private rented sector, building regulations' energy efficiency requirements and other policies where there is some degree of government control. As such, there is confidence in delivering the expected 27.8 MtCO₂ by March 2015 (see section 7.5 for more detail). There are additional government policy levers which have not been included in the demand modelling either because they are not yet agreed or enacted (e.g. energy efficiency regulations relating to consequential improvements to existing buildings) or because there is no evidence currently that they are required (for example minimum D energy efficiency standards for all buildings). Given these considerations, there is significant longer term upside potential for the market for energy efficient home improvements to develop beyond government forecasts. A key aim of the Green Deal is to move to a market framework where businesses and other organisations, in addition to energy suppliers, can compete for energy efficiency opportunities in new and innovative ways.

Since the Green Deal and ECO's announcement in June 2010's Budget, 22 high profile organisations have expressed their intention to participate in the market and signed an agreement with government to work to become the first Green Deal providers. This Pioneer Providers group includes

British Gas, E.ON, SSE, Carillion, Insta Group, Kingfisher, Mark Group, Gentoo, Wilmott Dixon Energy Services, Knauf, SIG and Re-Energise⁵⁸. In addition, other organisations, such as Wolseley, NPower and EDF Energy have indicated they are strongly considering entering. They are considering a variety of business models to deliver Green Deals to customers in innovative ways, across a variety of channels and leveraging a number of natural trigger points. A number of these are also involved in developing a financing solution through The Green Deal Finance Company.

Other early movers in the market are likely to include councils and registered social landlords, who can influence large stocks of housing under their stewardship. Being subject to Decent Homes standards⁵⁹, they already have experience in significant refurbishment programmes and are well equipped to identify energy efficiency opportunities. Budgets allocated to these improvements could also lead to ECO funding going further than would otherwise be the case.

Gentoo, a social housing provider in Sunderland has, in partnership with British Gas, piloted some of the principles of the Green Deal with its tenants. The programme aims to install packages of energy efficiency measures in approximately 1,100 properties. Some of the measures are subsidised through CERT & CESP⁶⁰, with a proportion of the remaining costs recovered through the application of a small charge on energy bills to the property for a 15 year period⁶¹, or collected via the rent account. Up to early January 2012, 86% of their tenants had agreed to participate in the scheme with 71% opting to pay via their energy bill. Take up rates such as these are far greater than the central estimate predicted by the Green Deal Household Model.

The Greater London Authority's (GLA) '*Delivering London's Energy Future*' strategy states its intention to retrofit 1.2m homes in the Greater London area by 2015 (this is equivalent to 100% of the total number of homes expected to be retro fitted in the national Green Deal). The GLA intends to do this by working with all the London boroughs to build on the success of *RE:NEW*, its refurbishment programme, that has retrofitted 11,000 homes to date. The GLA is working to integrate *RE:NEW* with new energy efficiency and energy supply funding streams, such as the Green Deal and the Feed-in Tariff, so retrofitting can be offered to all London homes by 2030.

Many other local authorities are also planning for the Green Deal, including for example: Birmingham City Council (who are in the process of procuring a Green Deal delivery partner for a potential contract value of up to £1.5bn), Greater Manchester, and several consortia of councils such as the West Sussex County Councils. In so doing they are developing a mix of innovative delivery models including partnerships with social enterprises and commercial organisations.

One further factor that will contribute to demand upside is the £200m launch incentive fund, to be spent over eighteen months from October 2012. The principal impact of the incentive, as it has been modelled for the IA process, is to de-risk the Green Deal policy. There is further potential, depending on final policy design, for the launch incentive to contribute to supporting demand above that which has been modelled. The intention is for the incentives to support a range of measures not fully subsidised by ECO, including loft insulation, easy to treat cavity wall insulation and other measures.

⁵⁸ The full list of 22 organisations can be found at :

http://www.decc.gov.uk/en/content/cms/news/pn12_042/pn12_042.aspx

⁵⁹ There is currently a backlog of 410,000 non-decent social homes in England. DCLG intends to allocate £2.1bn of capital investment over the Spending Review period to halve this number (see

<http://www.communities.gov.uk/housing/socialhousing/decenthomes/>).

⁶⁰ Carbon Emissions Reduction Target and the Community Energy Saving Programme.

⁶¹ With an indefinite service charge for any solar photovoltaic V installations

7.2 Impact on investment and employment

113. A key objective of the Green Deal Finance mechanism is to draw private finance into the energy efficiency market. This is projected to be between £1.0bn and £1.3bn for the first 3 years and to reach between £3.2bn and £4.1bn by 2022. Table 9 shows the amount of Green Deal finance raised in the central uptake scenario, for different finance assumptions. The low scenario assumes a proportion of measures will be paid for up-front rather than using Green Deal finance, the central run assumes all those who prefer to pay up-front are filtered out by the consumer survey and the high scenario assumes a greater amount of finance accruing from boilers. More detail on these scenarios is presented in Annex F.

Table 9 Volume of Green Deal Finance in central uptake scenario under different GDF assumptions (£m)

	Low GDF scenario	Central GDF scenario	High GDF scenario
2013	£269	£303	£369
2014	£354	£392	£464
2015	£385	£423	£496
2016	£400	£437	£501
2017	£366	£400	£461
2018	£313	£341	£399
2019	£291	£318	£376
2020	£272	£296	£355
2021	£257	£280	£339
2022	£262	£283	£343

114. The insulation sector has historically focused on the delivery of low cost cavity wall and loft insulation. The Green Deal and ECO will result in a move towards the delivery of more expensive measures. Installation rates of low cost measure such as loft insulation and CWI are expected to decline with higher priced, and labour intensive, measures such as SWI and hard to treat CWI increasing. This is expected to increase the overall number of jobs in the insulation sector. Table 10 sets out a range of estimates of the number of working hours it takes to install the main insulation measures.

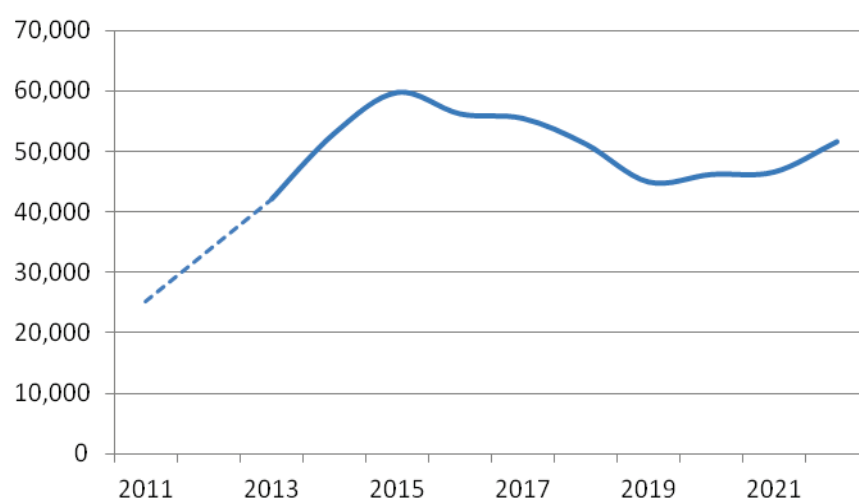
Table 10 Estimates of the number of labour-days required to install different insulation measures

	Number of labour-days required to install		Average number of measures per installer pa
	Low	High	

External SWI	6.7	12.0	19
Internal SWI	5.4	8.0	26
CWI – easy to treat	0.4	1.0	251
CWI – hard to treat	1.5	5.0	54
Loft top up	0.25	0.3	640
Floor insulation part of a package	1.0	2.0	117

115. The move towards higher priced measures is expected to lead to an increase in the number of installers from around 4,700 in 2007 to around 9,800 by 2015. There will also be a positive knock-on effect on the wider supply chain which is expected to employ between 29,000 and 50,000 people by 2015, up from around 22,000 in 2007/8.⁶² See figure, below, and Annex E for more detail.

Figure 19: Estimated employment supported by installation of all insulation measures



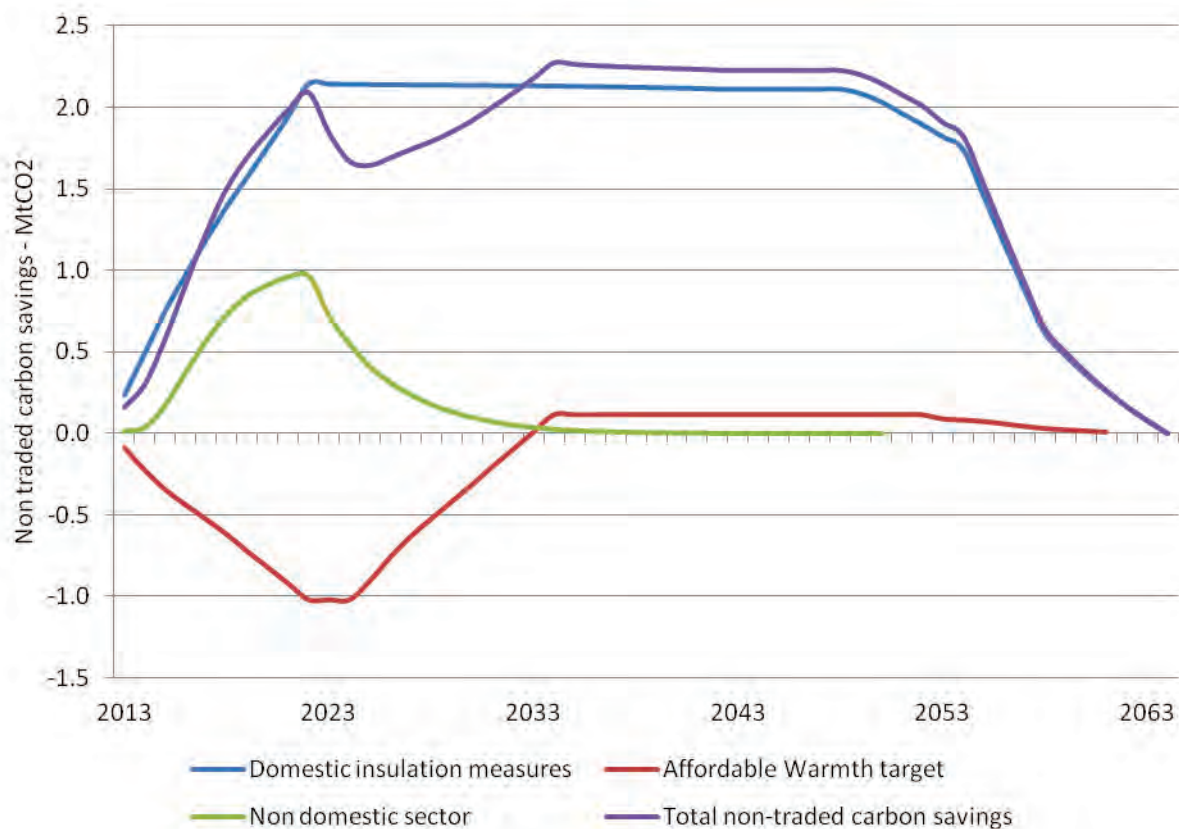
7.3 Carbon and energy savings

116. The Green Deal and ECO will reduce energy consumption and carbon emissions from households and businesses. Carbon emissions are divided into the traded (those covered by the EU Emission Trading System (EU ETS)) and non-traded sectors (those not covered by the EU ETS). The EU ETS covers electricity generation and the main energy-intensive industries (e.g. iron and steel, cement manufacture and chemicals) and it covers around 50% of UK GHG emissions. Reductions in energy consumption in properties with an electric heating system would therefore lead to reduced emissions under the EU ETS (traded carbon) due to reduced demand for electricity. For properties with gas, coal or oil heating systems, the reductions in energy consumption will lead to lower emissions from the non-traded Sector (non-traded carbon). Figure 20 presents the projected impact on carbon dioxide emissions in the non-

⁶² Source: *Low Carbon and Environmental Goods and Services: an Industry Analysis*; Innovas; 2009

traded sector as a result of the policy package. By March 2015 and 2020, total carbon dioxide savings in the non-traded sector are 0.38MtCO₂ and 1.8MtCO₂ per annum, respectively.

Figure 20: Non-traded carbon savings



117. There are two factors that drive these results. The first is that as insulation measures are installed, carbon savings rise relative to the BAU scenario, and then gradually decline as measures reach the end of their lifetime. The second is that heating measures installed under the Affordable Warmth target are expected to lead to higher gas consumption, as low income and vulnerable groups benefit from homes that are cheaper to heat, in many cases also switching from electric secondary heaters (carbon emitted in the traded sector) to gas central heating (non-traded sector carbon). This leads to a reduction in the level of carbon savings in the non-traded sector.

7.4 Key Risks

118. The Green Deal and ECO policies are aimed at reducing the features of the market that lead to low take-up rates of energy efficiency measures, while also creating an environment in which the market for energy efficiency measures can grow rapidly. However, there are some outstanding risks that the policy cannot manage. It has not been possible to quantify the effects of all these risks, but most of them are presented in different combinations within the sensitivity scenarios in section 7.5, below, and Annex F. The risks fall into the following categories:

- **Market failures:** The policy will ease all the market failures detailed in section 3.2, and address, in particular, the mis-alignment of incentives in the rental market, capital constraints and high discount rates, all of which result in under-investment in energy efficiency measures (also see section 3.5 for more details of how the policy addresses these failures). It is not currently possible to quantify the extent to which these failures will be addressed.
- **Consumer appetite for measures:** The analysis underpinning the results presented in this document are informed by survey evidence, calibrated according to the delivery of measures under existing energy company obligation schemes. There is a risk that households do not make energy efficiency decisions in the same way as assumed. There is also a risk that households could react disproportionately to any adverse publicity.
- **Costs and the performance of measures:** The cost effectiveness of all the measures covered in this document depend on the relationship between energy prices, the measure's cost and its in-use performance. A lot of analytical work underpins the assumptions made about these elements although, in a dynamic market, these can always be superseded by new evidence.

7.5 Sensitivity analysis

119. As discussed above, there is considerable uncertainty around the aggregate impacts of the policy package. The ability of models to fully capture the likely uptake of measures is limited, given the innovative and open market characteristics of the Green Deal and ECO policy framework. The Green Deal will enable the development of new business models and delivery systems, therefore predicting the uptake of Green Deals in the market is inherently difficult. A number of sensitivity scenarios have been used to illustrate this uncertainty. The obligations under the ECO are quantity targets – there is a high degree of certainty, once set, that the required savings will be achieved. What is uncertain is the cost to energy suppliers (and therefore the passed through cost to bill payers) of achieving these savings. The analysis shows that the costs of delivering the ECO Carbon target vary considerably between different scenarios.
120. Outside of the ECO the uptake of measures eligible for Green Deal finance is uncertain, as is the split between households and organisations opting for Green Deal finance⁶³ and those choosing to self-fund measures or use alternative finance. These will affect the amount of Green Deal finance that is likely to be raised and the total reduction in carbon emissions. The key sensitivity scenarios are set out below and more details can be found in Annexes A and F.

⁶³ Some measures are more likely to be financed through Green Deal finance and others by alternative financing means. Low cost measures, such as loft insulation, are more likely to be self funded by households, as the costs of Green Deal finance are high for those who do not need to borrow. For higher cost measures, lower cost forms of finance may be open to households, such as extending a mortgage. These cost savings could be outweighed by the benefits of keeping the finance connected to the property, rather than the household, however.

- **Energy prices.** Energy prices have a significant impact on the attractiveness of energy efficiency measures and on the amount of Green Deal finance that can be raised by installing a particular measure. The analysis presented is consistent with DECC's published fossil fuel price scenarios.⁶⁴ The central energy prices scenario used in this analysis is consistent with an average annual increase of 1.8% to 2022 (in real terms). This is compared against a high energy price scenario (an average annual rise of 3.9%) and a lower energy price scenario (a fall of 32% by 2013 followed by an average annual rise of 2.7%).
- **Consumer demand:** The number of households that choose to take up Green Deals in each year is based on the responses to the Green Deal consumer survey. The consumer preference function has also been adjusted to account for the impact of factors that were not included in the survey, such as marketing activity by Green Deal providers. However, there remains considerable uncertainty around how attractive the Green Deal will be to different households. The analysis includes high and low 'consumer preferences' scenarios to illustrate this uncertainty.
- **Interest rates:** The interest rate offered by Green Deal providers affects the amount of finance that can be raised and the total cost of a measure to the consumer. To keep the rate low, potential Green Deal Providers are exploring options including the creation of a special purpose aggregation vehicle which would be able to generate the scale required to access the lowest cost of finance on the capital markets. Following independent analysis, the central rate for this IA has been set at 7.5% (up from 7% in the consultation stage IA) and the sensitivity analysis uses a low rate of 6.5% and a high of 9.5%. The rate assumed for the non-domestic sector is 8% (the same as in the consultation IA). See Annex I for more detail.
- **SWI Energy savings:** The low historic sales of SWI means there is currently little in-situ data on actual energy savings delivered. The IA therefore includes a range of SWI energy saving estimates to illustrate the impact of the current uncertainty . See Annex A for details.
- **SWI learning rates:** There are a number of reasons to believe that the costs of SWI will fall as the industry is scaled up to meet the Carbon Saving Targets but the extent of these cost reductions is unknown. The central estimate is a fall in installation costs of 15% by 2022, based on the cost reductions seen in the CWI sector and feedback from industry. The sensitivity analysis uses a high and low estimate of 10% and 20%.
- **Assessment costs:** The Green Deal is a market mechanism and providers will be free to develop the offer to consumers that is most effective at driving sales. The way in which assessment costs will be recovered is unknown but a number of models could be adopted. The central estimate is based on the assumption that Green Deal providers provide the assessment at no upfront cost, provided the customer then takes up a Green Deal (the costs are then included in the overall Green Deal package). Half of the costs of the unsuccessful

⁶⁴ See Annex A for fossil fuel price assumptions and Annex F for sensitivity modelling results.

assessments⁶⁵ are also included in the cost of packages to consumers. A sensitivity scenario is included in which providers offer the assessment free and pass on the full costs of unsuccessful assessments to Green Deal customers.

- **Change in the decision making frequency:** The different assumptions around how the decision making frequency may change over time have also been incorporated. A low estimate of uptake has been based on the assumption that once households have a Green Deal assessment and decide not to take up a plan they are permanently removed from the stock of eligible households. A high estimate of uptake has used the assumption that the decision making frequency for SWI rises over time as households become more familiar with the technology.
- **Action by local authorities and communities:** Economies of scale in the installation of SWI mean there is considerable scope to reduce costs by treating multiple properties at once. The central estimate incorporates these cost reductions for the delivery of external SWI in the social housing sector. A sensitivity scenario is included in which action by local authorities and communities to co-ordinate delivery allow further economies of scale to be realised in the owner occupied and private rented sectors.
- **Minimum bill savings for customers:** Green Deal providers will be free to develop the package they offer consumers. The current demand for measures is based on responses to the Green Deal consumer survey. However, there is other evidence that suggests consumers may require significant net bill savings upfront in order to take action. A sensitivity scenario has been used to illustrate the impact on demand if consumers require a minimum level of net bill savings in year 1 in order to take up a plan.⁶⁶

121. These sensitivity scenarios have been combined to create a high and low estimate of the impact of the policy package. The high scenario reflects a significant increase in the demand for SWI and combines the following sensitivities: low interest rates, high SWI learning rates, rising SWI decision making frequency and strong action by local authorities and communities. The low scenario reflects a low demand for Green Deal packages and uses the following sensitivities: high interest rates, high Green Deal assessment costs, minimum bill savings from consumers and a falling decision making frequency.

Carbon targets

122. The uncertainty associated with the estimates presented in this section have a different impact on the uptake of measures inside and outside the scope of ECO. For measures inside the scope of ECO the main risk is around the cost of delivery, rather than the quantity

⁶⁵ Assessments that do not lead to a Green Deal being taken up. The uptake rate for households that have an assessment is assumed to be 1-in-3 meaning there are 2 unsuccessful assessment for each green Deal taken up.

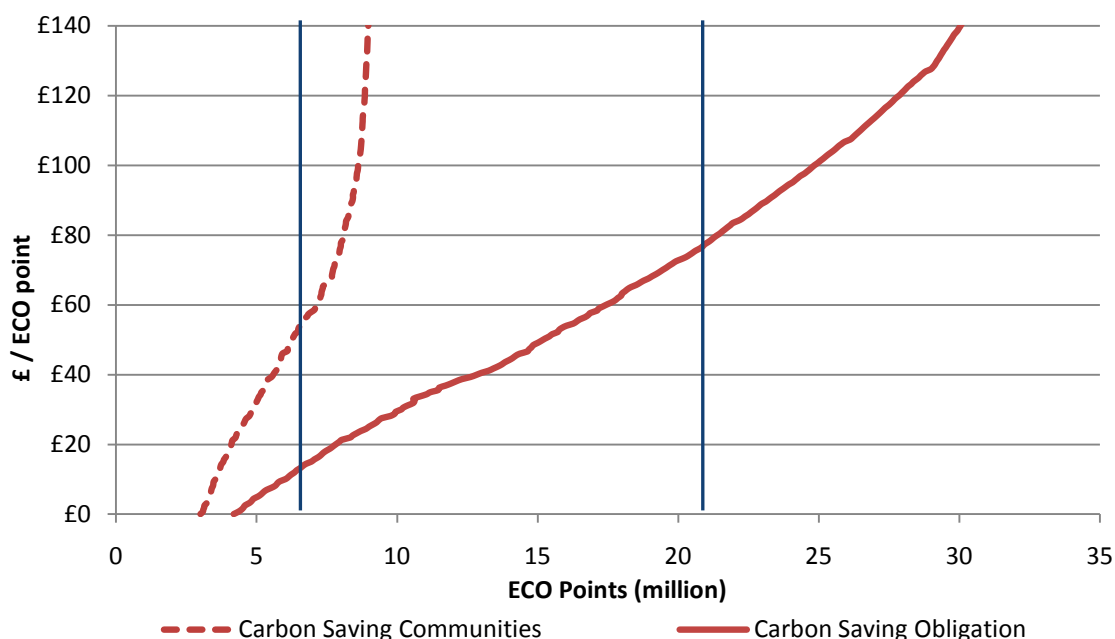
⁶⁶ The maximum annual repayment is 75% of the total bill saving.

delivered. Measures within scope of ECO are projected to make up around 83% of all measures delivered in the central scenario to 2022.

123. The central estimate of the cost to energy companies of meeting the ECO Carbon Targets is £950m per year plus an additional £350m per annum to meet their Affordable Warmth obligations. Energy companies are expected to meet the target by providing subsidised measures to households. The actual installation work will not necessarily be conducted by energy companies; the obligation could be contracted out to a range of firms operating in the sector including Green Deal providers. Independent firms will also be able to generate “ECO points”⁶⁷ independently and sell them on the ECO brokerage market. The subsidy will also often be combined with Green Deal finance. The actual rate of subsidy provided will depend on a wide range of factors. For example, if energy prices rise faster than expected, energy efficiency measures will lead to higher bill savings and so lower subsidies will be need to deliver the same benefit to consumers.
124. The ECO Carbon Saving Obligation target and Carbon Saving Communities target (with its Rural Safeguard) will require energy companies to deliver lifetime CO₂ savings. The cost of meeting the carbon reduction obligation will therefore depend on the amount energy companies will need to spend to incentivise enough households to take up energy efficiency measures (each of which will provide a certain CO₂ saving, effectively a value in terms of ‘ECO points’).
125. The GDHM has been used to provide an estimate of the number of ECO points (tCO₂ savings) that would be delivered for a given level of subsidy (£ per ECO point, or per lifetime tCO₂). This analysis provides an estimate of the ECO point supply curve (the number of ECO points delivered for different levels of subsidy), which is illustrated in Figure 21 below. The carbon targets for the periods January 2013 to December 2015 are shown as vertical lines and the point at which they cross each supply curve will determine the level of subsidy per ECO point required to deliver the targets. The actual carbon target is set between January 2013 to March 2015 and is 27.8 MtCO₂. This total carbon target comprises 20.9 MtCO₂ for the Carbon Saving obligation target and 6.8 MtCO₂ for the Carbon Saving Communities target (of which 15% (1 MtCO₂) is the Rural Safeguard target). The point at which both curves meet the x-axis shows the amount of carbon that would be delivered by measures covered by ECO if no subsidy was provided (£0 / tCO₂).

⁶⁷ Energy suppliers will install eligible measures and count the associated lifetime carbon savings, as calculated using the Green Deal assessment tool, to meet their ECO carbon targets. CSC and CS carbon targets will be calculated on the basis of lifetime carbon savings of insulation measures - 1 ECO point per tCO₂ saved over its lifetime. AW targets are calculated on the basis of lifetime notional heating cost reduction from insulation measures and heating systems. See Annex H for further details.

Figure 21 Central ECO point supply curve – 2013-15⁶⁸



126. There is a high level of uncertainty around the position and gradient of the ECO point supply curve. The sensitivity analysis has been used to produce a range of possible supply curves to illustrate how the cost of meeting the Carbon Saving obligation target will vary. These are shown in Figure 22. In all cases, the level of the Carbon Saving Obligation target will be fixed but the rate of subsidy needed to deliver the target varies. This will have an impact on the total cost of delivering the ECO carbon target, as illustrated in Figure 24.

127. The Energy Act 2011 includes new powers which will allow the Secretary of State to monitor closely the measures delivered under ECO and crucially the cost to the energy companies of delivering these measures. The brokerage market will also provide transparent information to Government on the costs of delivering measures in the wider marketplace⁶⁹. This information will allow the Government better to understand the inherent uncertainty around the total cost of delivering the ECO. Alongside this close monitoring, DECC will also carry out a more comprehensive review of delivery as part of wider evaluation of the Green Deal. This review is expected in the first half of 2014, when the delivery of ECO and Green Deal has bedded in.

⁶⁸ The modelling analysis is based on simulating annual uptake of measures. The ECO supply curves presented in this section are for the period 2013 to 2015. The actual ECO interim target will be set for the period Jan 2013 to March 2015. Proportion of the carbon target delivered in the first three months of 2015 will therefore be set on a prorate basis.

⁶⁹ The Government will be consulting on the brokerage market later in 2012.

Figure 22 ECO point supply curve for Carbon Saving Obligation in High, Central and Low scenarios

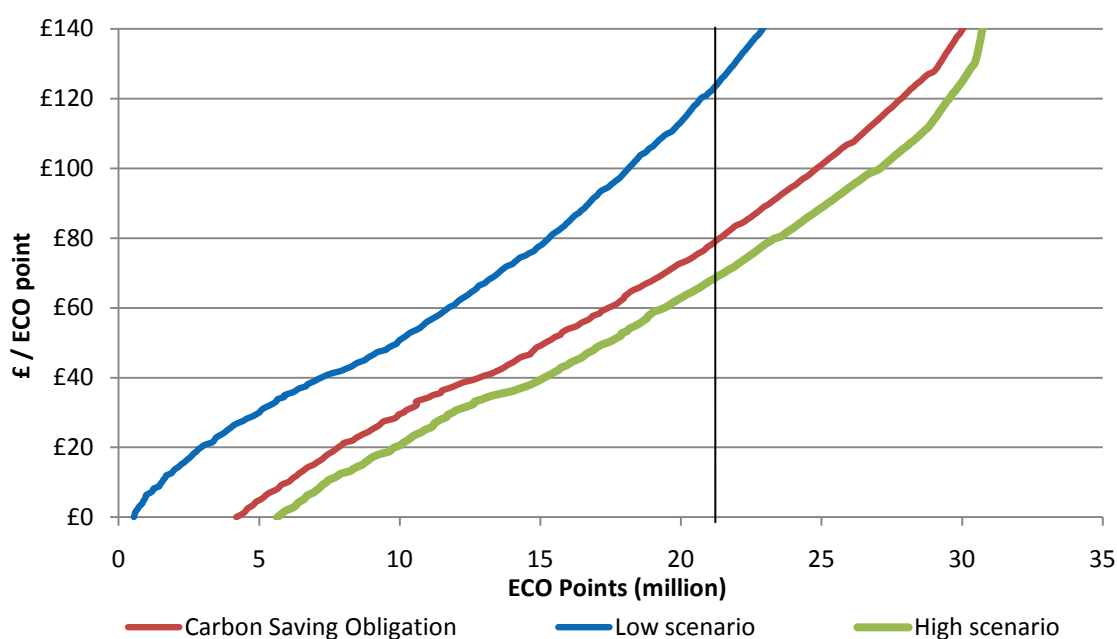
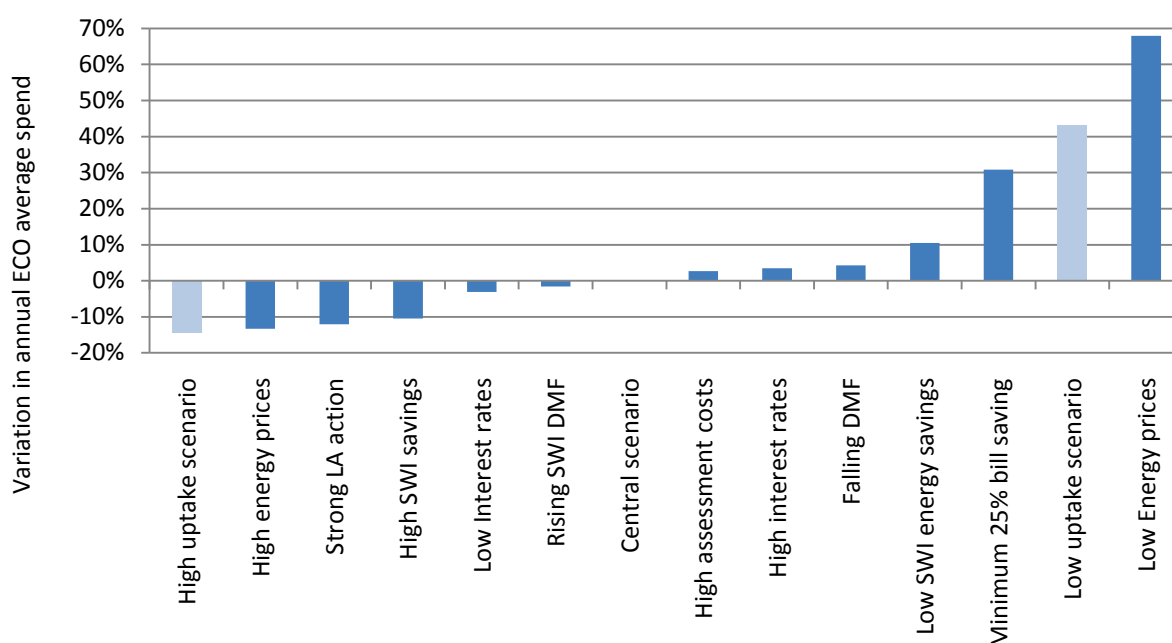


Figure 23 Variation in annual cost of meeting the first interim ECO Carbon target for different sensitivity scenarios



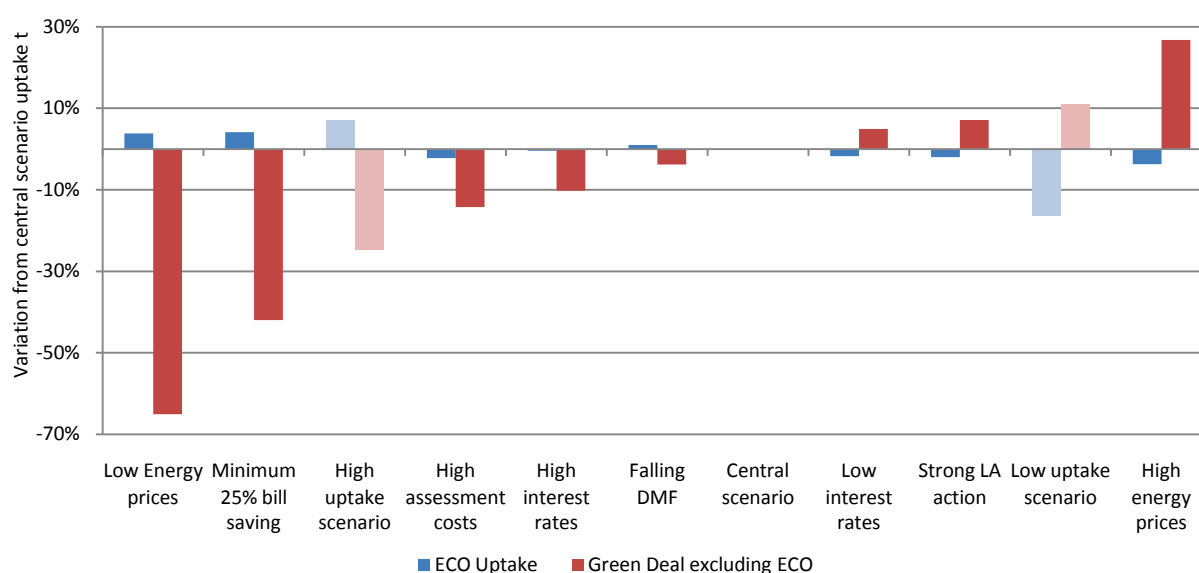
Green Deal demand

128. For the measures that are outside of the scope of ECO, uptake will depend on a large number of factors. The Green Deal is a market based mechanism which will enable the development of new business models and delivery systems. The policy does not impose specific delivery requirements on providers but they will be free to develop a range of offers to consumers and businesses. Predicting the uptake in this section of the market is inherently difficult. The Green Deal is an innovative market instrument and participants offers to consumers have not yet been fully developed. The sensitivity analysis therefore provides a

wider range of uptake estimate of Green Deal only measures. A number of measures will be put in place to manage this uncertainty during the roll-out of the Green Deal, including a comprehensive evaluation strategy and reviews as discussed above.

129. Figure 24: shows the total number of Green Deal packages taken up in the different sensitivity scenarios, split between the ECO-funded packages and the Green Deal only packages. The total carbon saving from the ECO is fixed in all scenarios, but the proportion of the target that is met from SWI and CWI installations does vary (owing to changes in the relative cost effectiveness of each type). The take up of Green deal only packages ranges from 27% higher to 65% lower than the central estimate, compared to a range of 4% higher to 4% lower for the number of ECO packages.⁷⁰ As mentioned previously in the IA, there is a high level of uncertainty associated with the projections associated with the Green Deal mechanism, given its innovative and open market nature of this.

Figure 24: Variation in uptake of measures by March 2015 financed by ECO and Green Deal, and Green Deal only



7.6 Aggregate impact of the Affordable Warmth target

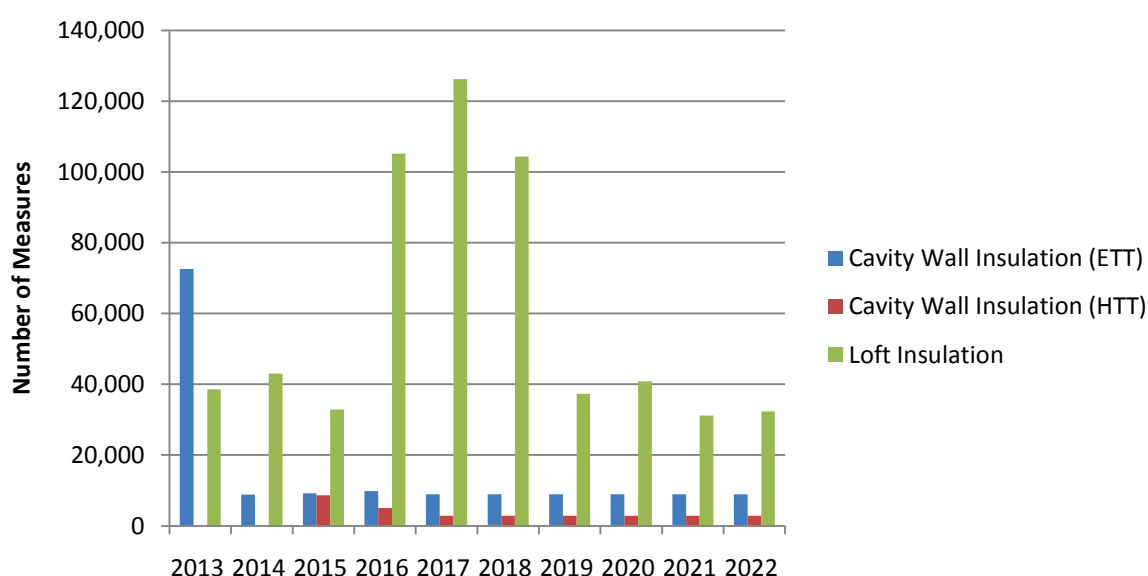
130. We estimate that around 1 million heating measures and around 770,000 insulation measures will be delivered under the ECO Affordable Warmth Target by the end of 2022. In the first period of ECO (October 2012 – March 2015) we estimate that around 280,000 heating measures and around 180,000 insulation measures will be delivered, assuming that measures are delivered from the very beginning of the obligation (see ‘Setting the Affordable Warmth Target’ below for detail on how this relates to the Affordable Warmth target). Over the lifetime of the measures this leads to estimated actual energy bill savings for low income and vulnerable households of around £8.9bn, carbon emission reductions of around 20 MtCO₂e in the EU ETS sectors, and an increase of around 9 MtCO₂e in the non-traded Sector.

⁷⁰ CWI saves less carbon per installation which leads to small changes in the total number of ECO / Green Deal packages

131. The delivery of insulation measures under the AW target in the first year of the ECO Affordable Warmth is dominated by lower cost CWI and LI. This is driven by the relatively high availability of opportunities to install easy-to-treat Cavity Wall Insulation at the beginning of the policy, and the expectation that energy suppliers will aim to deliver the most cost-effective measures first. Differences in projected delivery levels of loft insulation across years is driven by the gradual exhaustion of more cost-effective opportunities in the earlier years, increasing the projected attractiveness of loft insulation as a means of meeting the Affordable Warmth target from 2016-2018, before projected changes in energy prices towards the end of the decade alter the most cost-effective mix of measures.

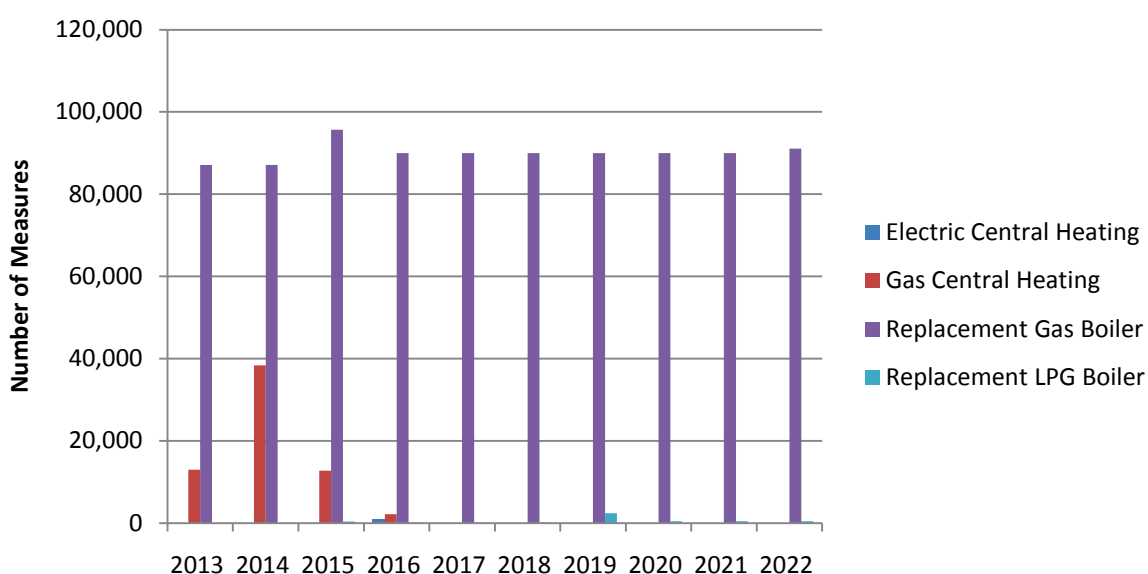
132. In total, around 590,000 Loft Insulations and 150,000 easy to treat cavity wall insulations are delivered to the end of 2022. The uptake of hard to treat Cavity Wall Insulation is estimated at around 30,000 while a nominal number of Solid Wall Insulation installations are delivered in the modelling.

Figure 25 Estimated number of insulation measures installed under the Affordable Warmth Target, 2013-2022



133. The main heating measures installed in the modelling are replacement gas boilers, around 900,000 estimated to be delivered by the end of 2022, with a smaller number of new central heating systems being installed in dwellings where no central heating previously existed (around 70,000 are estimated to be delivered). The installation of new gas central heating is projected to be concentrated in earlier years, with a greater emphasis on the delivery of replacement boilers and insulation in later years as opportunities to deliver new central heating are exhausted.

Figure 26 Estimated number of heating measures installed under the Affordable Warmth Target, 2013-2022



Setting The Affordable Warmth Target

134. The Affordable Warmth target will require energy suppliers to achieve a total reduction in lifetime notional space and water heating costs of £4.2bn. Suppliers are expected to meet this target by delivering predominantly heating and insulation measures to households eligible for support under the target. The total cost of delivering these measures will depend on the costs of each measure delivered and the mix of measures delivered. The Affordable Warmth model has been used to estimate the cost associated with delivering this level of notional heating cost reduction. The central estimate of the cost to energy suppliers of meeting the Affordable Warmth target is around £350m per year. An allowance has been made for the possibility that Affordable Warmth delivery may take some time to ramp up over the first three months of the obligation, and therefore the target has been set on the projected delivery of measures from January 2013 – March 2015, with some further allowance for uncertainty around the level of low cost CWI opportunities. As a result, it is expected that the target could be met based on the projected delivery of around 260,000 new and replacement heating systems, and the insulation of around 45,000 cavity walls and 90,000 lofts.

135. The target has been revised upwards since the consultation Impact Assessment. This is a result of three factors (see Annex D for more details):

- The heating cost reductions in the revised target relate to space *and* water heating from the installation of heating systems, whereas the original target did not include water heating. This update reflects final decisions on the Affordable Warmth target metric.
- Revised estimates of the number of 'easy-to-treat' cavity walls. Low cost cavity wall insulation is the most cost-effective measure in achieving lifetime notional heating cost reductions, and increasing the estimated number of 'easy-to-treat' cavity walls means that a greater level of cost reductions can be achieved for the same level of resources.

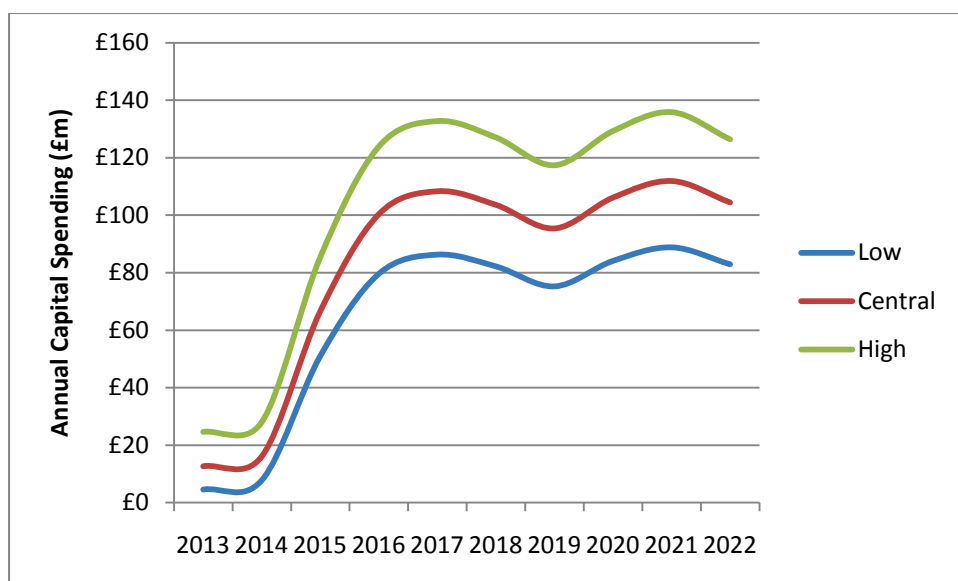
- Updated cost estimates for heating measures. The estimated costs of new and replacement heating systems in the Affordable Warmth model are based on data from previous Government backed energy efficiency schemes. The cost estimates included in the modelling of the original target have been updated, with the revised estimates resulting in a more significant number of heating systems being delivered for the same level of resources.

7.6 Aggregate impact of Green Deal in the non-domestic sector

136. The estimated impacts of the non-domestic Green Deal and associated supporting policy vary depending on the assumptions made. The majority of the variation derives from the assumptions surrounding the analysis of the supporting policy in the PRS.⁷¹ This reflects not only the likely scale of the policy relative to the non-domestic Green Deal, but also the uncertainty surrounding the precise nature of the policy and how it is implemented.
137. Figure 27 presents the expected take-up of measures as a result of the policies, which peaks between 2015 and the early 2020s. Capital spending on annual installation in the central scenario vary between around £100m pa and £115m pa during this period. Take-up resulting directly from the Green Deal peaks in the early years of the policy, and declines over time as more and more abatement opportunities are exhausted.
138. For the purposes of the analysis, take-up as a result of the supporting policy in the PRS peaks in the year the policy enters into force, with installations occurring up to four years in advance of the policy as a result of market anticipation. 62% of the non-domestic properties are in the PRS. Take-up is closely related to the lease period, and reflects the number of properties that begin a new lease in a particular year (see Annex C).

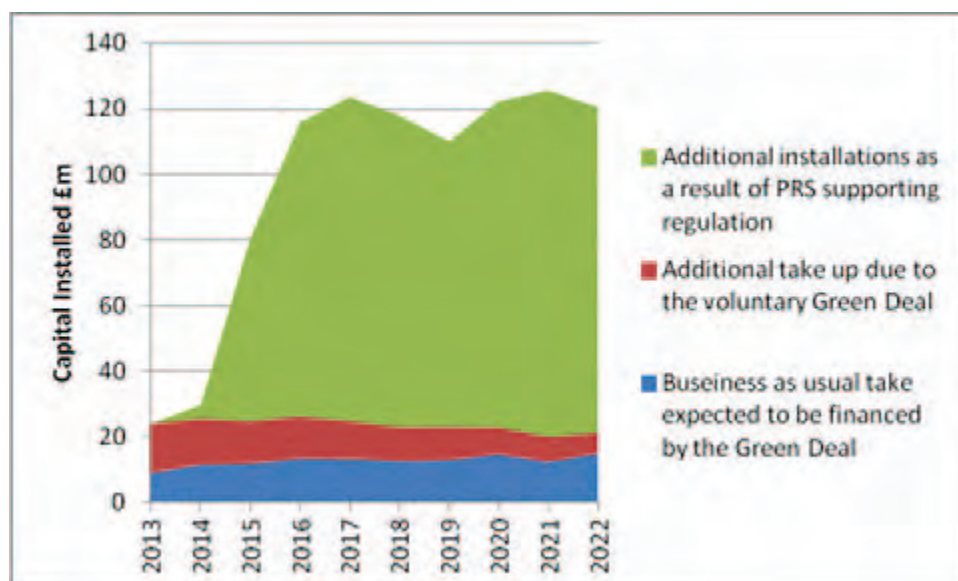
⁷¹From April 2018, all private rented properties (domestic and non-domestic) should be brought up to a minimum energy efficiency standard rating, likely to be set at EPC rating "E". This requirement would be subject to there being no upfront financial cost to landlords. The intention is that landlords would have fulfilled this requirement if they had either reached "E" or carried out the maximum package of measures funded under the Green Deal and/or ECO (even if this does not take them above an "F" rating See annex B for further details..

Figure 27: Green Deal take-up in the non-domestic sector (Green Deal and supporting policy in the PRS)



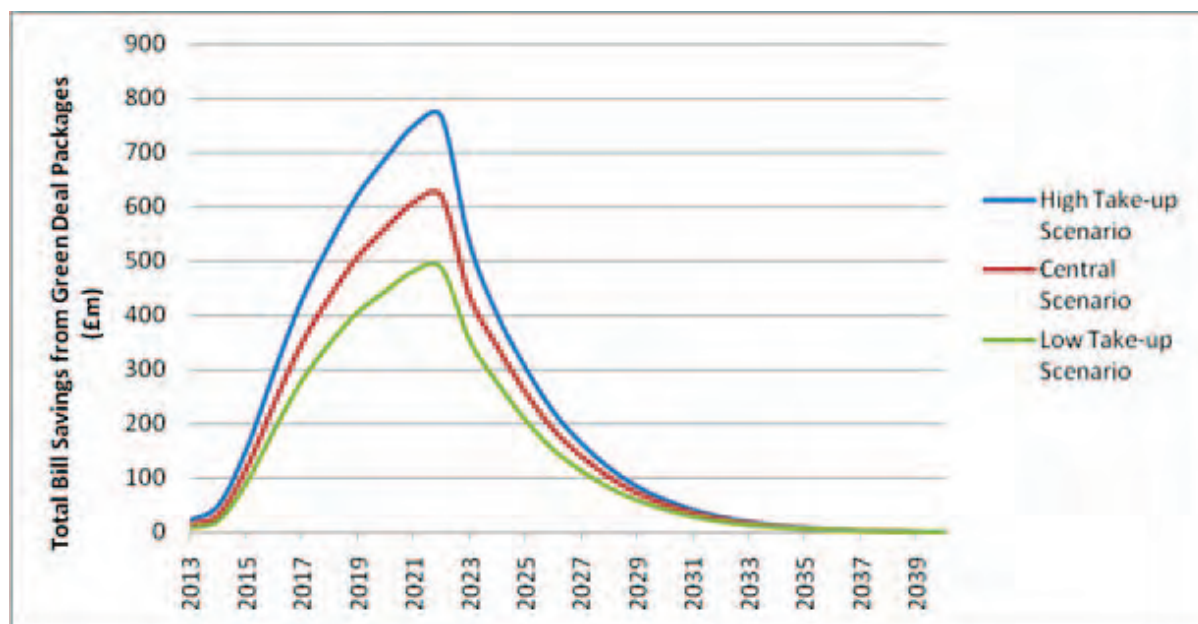
139. Figure 28 shows the estimated take-up of Green Deal packages including those taken-up by those organisations who, in the business as usual, undertake capital investment but now use the Green Deal to finance it.

Figure 28 Green Deal packages take-up in the non-domestic sector



140. The take-up scenarios presented above, deliver a bill savings profile on the energy saved shown in Figure 29, below. These exclude the Green Deal charge but, as the average Green Deal package is assumed to pay back in five years, a significant proportion of these savings will be kept by those choosing to take out a Green Deal. The profile of the savings drop off quickly after the Green Deal programme ends in 2022. This is because we have assumed that measures for non-domestic buildings are on average shorter lived than those taken out in the domestic sector.

Figure 29 Non-domestic sector's bill savings after capital payments have been excluded



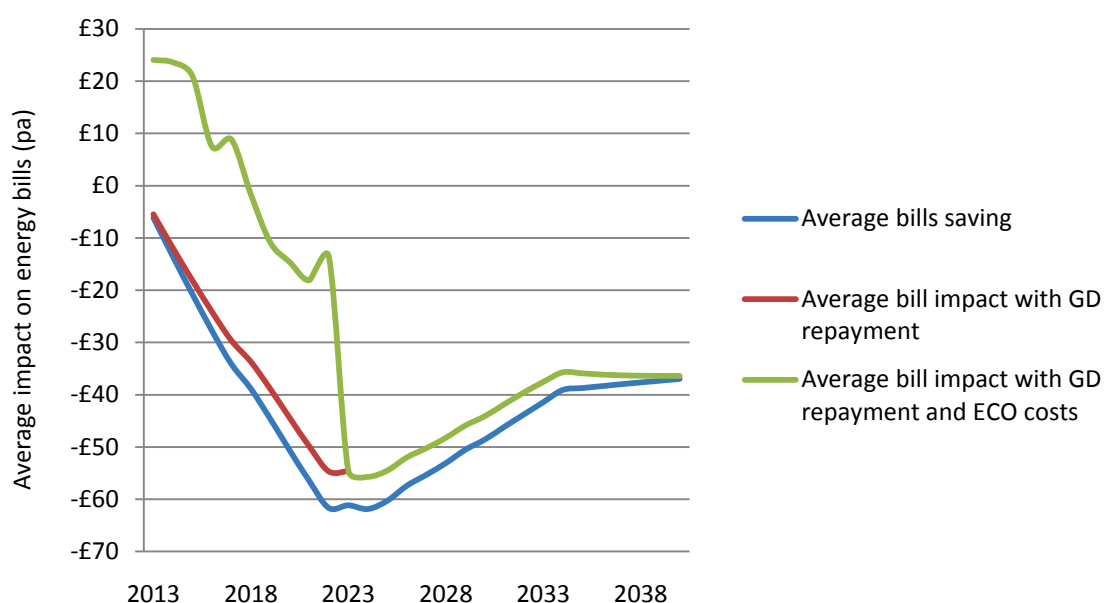
7.7 Distribution of costs and benefits

141. The impact of the Green Deal and ECO will vary between different groups within society. In the domestic sector, the benefits from energy efficiency measures will be concentrated in households that install them. These households will also contribute to the installation and assessment costs through the Green Deal repayments. By comparison, the costs borne by energy companies of meeting the ECO will be passed on to all domestic energy consumers, in the same way that energy companies currently pass on their costs of achieving their CERT and CESP targets. There will, therefore, be some households whose bills will be lower following the introduction of the policies and some households whose bills will be higher than in the absence of any carbon saving policies. Some of the costs resulting from the implementation of the policy package will also fall on businesses. Energy companies will incur the costs of meeting the ECO targets and the cost of administering the Green Deal payment process. There will also be costs resulting from the accreditation framework and operating Green Deal finance mechanism.
142. For households and businesses that take out a Green Deal plan, the benefits of reduced energy consumption would be partially offset by the Green Deal repayments needed to cover the installation and assessment costs. However, as energy prices are expected to rise, Green Deal customers are likely to see growing savings on their energy bills over time.

Average impact on household energy bills

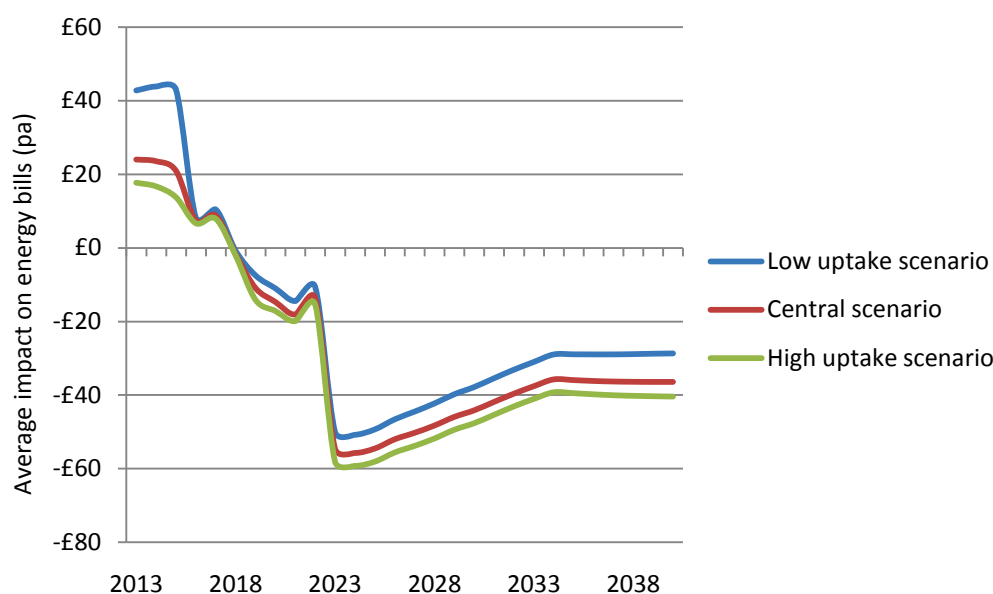
143. Figure 30 shows the central estimate of the average impact of the Green Deal and ECO on household energy bills, relative to there being no carbon savings policy in place. The installation of energy efficiency measures is expected to lead to lower energy bills compared to the BAU scenario. Households are likely to face the costs of ECO, which will be passed on by energy companies as higher energy prices. Once the Green Deal repayments have been included the average impact is smaller, but bills are still lower. Figure 30 shows that the pass-through of ECO costs is likely to dominate during the period to 2017. However, this does not mean household energy bills will rise in 2013 due to the introduction of the ECO. The ECO will replace the existing supplier obligations (CERT and CESP) the cost of which are already reflected in current energy bills.

Figure 30 Impact of Green Deal and ECO on average annual energy bills



144. The impact on energy bills will vary depending on the cost of meeting the ECO targets. Figure 31 illustrates the range of impacts under the different uptake scenarios. In the Low Uptake scenario, fewer measures are taken up and energy companies are required to provide higher subsidies to meet the first carbon targets. This leads to a higher net impact on energy bills and smaller savings. In the high uptake scenario, more measures are delivered and subsidies are lower, leading to a smaller rise in bills and deeper savings.

Figure 31: Impact on average annual energy bills in different sensitivity scenarios



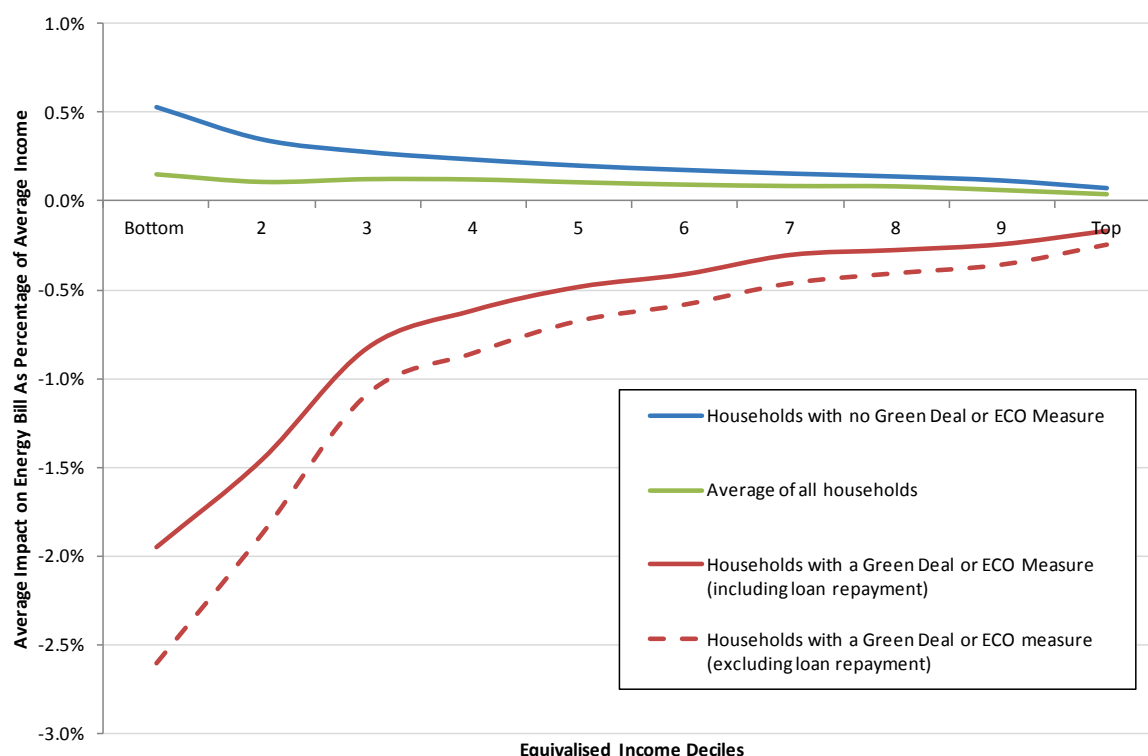
Distributional impact of change in energy bills

145. Figure 32 shows the projected impact of Green Deal and ECO on energy bills across different income groups in 2020. The costs of measures delivered by Green Deal finance will be borne by the beneficiaries of the measure, but the ECO is expected to be funded through energy bills. This means that those households that do not take-up a measure under the Green Deal or ECO will – compared to no carbon saving obligation being in place – see their bills increase; while those taking up measures will see their bills decrease significantly as a proportion of income, in particular those in the lowest income groups. The average impact across all households is a slight increase in bills, but with a broadly similar impact across the majority of income groups. This indicates that, despite the potential for costs being recouped through bills to be regressive, the average impact across income groups is broadly proportionate as a percentage of average income in each income decile group⁷². It should be noted however the majority of households in each income group are on the blue line (households with no Green Deal or ECO measure), and not on the red lines (households with a Green Deal or ECO measure), and for

⁷² This presents a revised picture to that detailed in the consultation Impact Assessment, where, on average, less well-off groups saw their bills rise proportionately more than better-off groups as a percentage of expenditure. The more even distribution of average impacts across groups is primarily a result of a greater share of ECO resources being explicitly targeted at lower income groups through the Carbon Saving Communities obligation; but also in part due to the decision to allocate the ECO on a per kWh basis rather than customer accounts (see Annex H), as well as higher total projected delivery rates of measures, and the proportion of which that go to low income households under both the Affordable Warmth and Carbon Savings targets. The average bill saving for those taking up measures is lower as a percentage of income across the majority of income groups compared to the consultation Impact Assessment, which is driven by a change in the mix of measures delivered. Figure 32 includes a greater number of measures delivered with relatively smaller associated bill savings, such as loft top-up insulation, compared to the consultation Impact Assessment which included a mix of measures with a greater concentration of solid wall insulation and heating systems. Uncertainty remains around the distribution of Green Deal and ECO funded measures across different groups, which is discussed in Annex H.

these households the resulting average increase in bills is a greater proportion of average income for those in lower income groups than in wealthier groups.

Figure 32 Distribution of impact on energy bills for different income groups in 2020



146.

Uptake of insulation measures by tenure

147. A significant proportion of the uptake of SWI is expected to be in the social housing and private rented sectors. Partnerships with social housing associations and local authorities will allow energy companies to benefit from economies of scale in the delivery of SWI, enabling them to meet the targets more cost effectively (see Box 2 for more information). The implementation of the regulation of PRS F and G-rated properties will be a key factor driving the uptake of CWI and SWI in that sector. For CWI, the majority of the actual uptake will be in the owner occupied sector, but uptake as a proportion of technical potential will be higher in the social and private rented sector.

Table 11 Uptake of wall insulation by tenure (excluding Affordable Warmth)

	Uptake of SWI by 2022	Uptake as % of SWI technical potential in tenure	Uptake of CWI by 2022	Uptake as % of CWI technical potential in tenure
Social housing	382,134	43%	637,337	59%
Private rented	345,886	23%	328,834	40%
Owner occupied	227,883	5%	1,550,928	40%

Uptake of insulation measures by house size

148. The uptake of measures across different house size is driven largely by the cost effectiveness of delivering carbon savings. Larger properties consume more energy and, although measures tend to cost more in larger properties, energy savings delivered by installing insulation are typically higher per £ spent. Higher bill savings available to larger properties mean larger amounts of Green Deal finance can be raised, increasing the uptake of measures among these house types. Larger houses also provide more cost effective carbon saving to energy companies seeking to meet the ECO targets, and so received higher subsidies. Flats are also likely to attract significant ECO subsidies, as energy companies seek to benefit from economies of scale resulting from insulating multiple properties at the same time.

Table 12 Uptake of wall insulation by houses size (excluding Affordable Warmth)

	Uptake of SWI by 2022	Uptake as % of SWI technical potential in house type	Uptake of CWI by 2022	Uptake as % of CWI technical potential in house type
Large detached	143,777	24%	421,814	54%
Small detached	53,090	15%	231,047	34%
Large semi	145,464	10%	600,084	55%
Small semi	106,612	13%	389,119	36%
Large terraced	72,808	6%	171,786	45%
Small terraced	64,026	7%	115,649	28%
Flats	370,125	23%	587,600	43%

Impact on Fuel Poverty

149. The impact of Green Deal and ECO on fuel poverty is influenced by whether a household takes up measures and the extent to which the costs of the ECO are recouped from energy bills. Households receiving measures will see their thermal efficiency improve and their risk of fuel poverty reduced. The costs of the ECO are expected to be recouped from energy bills, therefore households not receiving measures will see their risk of fuel poverty increase. In the short run, when delivery of measures is in its early stages and energy bills reflect the costs of the ECO, overall fuel poverty will rise relative to there being no carbon saving obligation in place. However, relative to the costs on existing bills from energy companies' CERT and CESP-compliance, there is likely to be little change. In the longer term the cumulative benefits of the measures installed under the policy will result in a net reduction in the number of households in fuel poverty.

150. It is challenging to project and quantify the impact of Green Deal and ECO on fuel poverty. In addition to uncertainty about which households take-up which measures, and the costs of delivering them over time, there is uncertainty around changes in the level and distribution of incomes across households, changes to the housing stock independent of the Green Deal and

ECO, and energy prices. Based on projected changes in incomes, prices and the housing stock, the measures installed under Green Deal and ECO are estimated to result in a net reduction of between 125,000 – 250,000 households by the time the costs of ECO are no longer passed through to bills in 2023.⁷³

Cost to business

151. The analysis has included a detailed assessment of the costs of the policy package to business. This focuses on the direct costs to business, although many of these costs will be subsequently passed on to consumers (for example, the costs to energy companies of the ECO are likely to be passed on to energy consumers leading to the bill impacts presented in Figure 30) There are several of elements to this analysis
- The ongoing cost to Green Deal providers of running their business. These are based on an initial set up cost of £16 and an annual management cost of £8 per Green Deal. These costs are included in the analysis of the uptake of measures as they affect the amount of Green Deal repayment a provider will charge to consumers. These are broken into two components
 - o The direct costs of the Green Deal Finance mechanism itself
 - o The wider costs of running the Green Deal provider's business (marketing and sale activities, general business overheads)
 - Cost to other businesses of the Green Deal mechanism (including the costs of the accreditation of installers, assessors and products),
 - Cost to energy companies of the ECO
152. These costs are set out in Table 13. Not all of these costs are inside the scope of the One In One Out (OIOO) analysis. The costs that are incurred as a result of voluntary activity by businesses are not included in the OIOO, which only focuses on regulatory costs imposed by the legislation on existing businesses (as advised by the Better Regulation Executive).

Table 13 Cost to business (£m)

Cost	NPV	Further Detail
(1) Green Deal Provider costs	£670	
(2) - Of which direct costs of Green Deal finance mechanism	£146	Table 15
(3) - Of which other business costs (1 – 2)	£523	
(4) Costs of Green Deal Finance mechanism to other businesses	£275	Table 15

⁷³ This projected estimate represents a lower estimate than detailed in the consultation impact assessment. This is a result in a change in projection methodology rather than final policy decisions. It is anticipated that estimating the impact using the same methodology would result in the measures modelled in this final impact assessment having a greater impact on reducing fuel poverty in the long run than the set of measures detailed in the consultation stage impact assessment.

(5)	Cost of business (energy companies) of meeting the ECO targets	£10,812	Table 16
(6)	Cost of business (energy companies) of administering the ECO targets	£17	Table 17
	Total cost to business	£12,443	
	Total cost to business (excluding ECO)	£1,631	
	Total cost to business of Green Deal mechanism (2 + 4)	£422	
	Total cost to business included in OIOO calculation (non voluntary costs)	£10,963	

One In One Out

Introduction/Summary

153. The cost to business is defined as the direct incremental economic cost to business of complying with new regulation minus the direct incremental economic benefit to business which results from new regulation. Second order costs and benefits are not considered, thus any costs ultimately passed through to consumers remain as costs to business here.

154. The OIOO calculation for Green Deal and for ECO are discussed separately. The Green Deal calculation includes cost and benefits incurred by energy companies, installers and product manufacturers; while the ECO calculation is based on energy companies' costs.

155. The discussion below presents estimates of the direct impact of the Green Deal and the ECO. For Green Deal, an equivalent annualised⁷⁴ net cost to business (EANCB) of £7m. For ECO, an EANCB⁷⁵ of £1,258m is estimated⁷⁶. This gives a combined Green Deal and ECO EANCB of £1,265m (see Table 14, below).

Green Deal cost to business

156. A full list of Green Deal costs to businesses are included in Table 15. This section summarises the direct costs for energy companies, Green Deal installers, manufacturers of Green Deal measures in scope for OIOO. The evidence and methodology for these costs can be found in Table 15. Costs incurred by Green Deal providers and advisers are not included in this calculation. This is a conservative omission as these markets will be newly created and voluntary to enter. Firms would only enter the market if they perceived there would be a net

⁷⁴ In accordance with OIOO methodology, the costs and benefits are annualised over the period of costs. This is the sum of the policy length (10 years) plus the length of the longest GDF plan (20 Years). This is 29 years in total as the modelling assumes costs and benefits occur in the beginning of each year.

⁷⁵ In accordance with OIOO methodology, the costs and benefits are annualised over the period of the costs of ECO (10 years).

⁷⁶ The ECO may yet be classified as imputed taxation by ONS. However, in the absence of such a decision we will continue to treat it as a regulatory measure.

positive benefit from entering. Costs that are borne by energy companies but are transferred to Green Deal providers, such as the administration cost to energy companies of Green Deals, are also not included. Table 15 includes a description of which costs are/aren't in scope and why.

157. There will also be considerable net benefits to businesses that take out a Non-domestic Green Deal. The estimated net present value to these businesses is £1.1bn⁷⁷. These costs and benefits are not included in OIOO as businesses are not regulated in the current policy climate to take out Green Deals. These costs and benefits will be fully considered in any forthcoming PRS regulation impact assessment.

158. Table 14, below, shows the cost to businesses, imposed by Green Deal, for OIOO purposes.

Energy Company Obligation (ECO) cost to business

159. The costs of meeting the ECO target that fall on energy companies will be the cost of subsidy given to generate ECO points as well as the costs of administering the scheme. The full details of these costs can be found in section 9.

160. The total cost of generating ECO points will be the amount needed to drive householders' demand for installations. This will include contributions to the installation costs, subsidy to overcome demand barriers and hidden costs, and any "additional subsidy" (or rent)⁷⁸ accruing to householders or businesses from the market for ECO points. The share of this amount accruing to businesses would be counted as a benefit. However, as the proportion is hard to predict, it has not been included in the above calculation. Had this been included, there would have been some benefits to businesses, and thus a lower net cost to businesses.

161. Table 14, below, shows the cost to businesses imposed by ECO, for OIOO purposes.

Table 14 Costs to business of Green Deal and ECO for OIOO - £m

		2012 PV	EANCB
Green Deal mechanism costs			
Energy Companies	Changes to energy company internal systems	£15.10	£0.809
	Central Charge Database	£2.92	£0.156

⁷⁷ See Table 8 – note Benefits for businesses that take out Green Deals are calculated using the private value of the energy savings rather than the social value, as in the NPV. Costs include installation costs, additional costs, assessment costs and finance costs.

⁷⁸ See section 9.1 for explanation and more details.

	Electricity companies collection and remittance of GD payments	£100.70	£5.394
Manufacturers	Product assurance	£0.56	£0.030
	Oversight body ⁷⁹	£15.59	£0.835
GD installers	Certificate Installers	£0.03	£0.002
Total GDM		£134.89	£7.226
ECO costs			
Energy Companies	Cost of ECO points	£10,811.59	£1,256.04
	ECO Administrative costs	£16.3	£1.89
Total ECO		£10,827.89	£1,257.93
Total costs			
Combined cost of GDM and ECO		£10,962.78	£1,265.16

⁷⁹ Assumes 1/3 of 47m oversight body charge is paid for by installers

8. Green Deal mechanism costs

Introduction

162. This section sets out the estimated mandated costs associated with the Green Deal framework of advice, accreditation and assurance and the administration of the Green Deal plans. Estimates are derived from discussions with stakeholders and responses to the Green Deal and ECO consultation.
163. For most businesses, participation in the Green Deal market is voluntary. Green Deal Providers, installers and advisers will only participate in the market if the benefits to them from doing so are greater than the costs of complying with the required standards. The mandated costs of the Green Deal mechanism are included in the overall cost benefit analysis for the Green Deal and the ECO for this IA (see section 7).
164. New entrants into the Green Deal market expect a net benefit from participation. Therefore for these businesses the costs are not included in the One In, One Out calculation. However, it does include costs mandated by the Green Deal on existing businesses, for example the costs to Energy Companies to administer Green Deal payments.
165. The consultation set out a preferred policy position for the Green Deal mechanism. In addition, assumptions were made about how the mechanism would function. Annex G discusses areas where evidence gathered through the consultation and further discussions with stakeholders have led to material modifications of proposals⁸⁰.

Table 15 Mandated costs of the Green Deal mechanism

Costs	Total cost (NPV, £m)	Who bears the cost	Further detail
Assessments (all costs outside OIOO, as market entry is voluntary)			
Cost of assessments	1,044	Domestic: Households	Cost/domestic assessment: £112.50
	130	Non-domestic: building owners	Cost/non-domestic assessment: £698
Consumer protection (in scope of OIOO: Certificate Installers and manufacturers' contribution to product assurance)			
Energy Saving Advice Service	12.1	Government	
Accredit Advice and Installation	2.8	Certification bodies	
	0.2	Government	

⁸⁰ The response to the consultation can be found on the DECC website
http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

Adviser training	10.7	Advisers	Per domestic adviser: £2,280 to £4,560. Per non-domestic adviser (top up): £1,400
	0.9	Government	
Certificate Advisers	26.0	Advisers	
Certificate Installers*	0.0 ⁸¹	Installers	Advisors: annual cost/Installers: de minimis
Scope of Green Deal	0.2	Government	SI will specify eligible measures
Product assurance*	0.56	Manufacturers	Test two systems pa/£30,000/test; plus spot-checks
	0.28	Government	
Secondary Disclosure*	0.0 ⁸²	Competent Person Scheme Operators	For amending electronic notification systems to include Green Deal flag
	0.2	Government	
Addition of measures	0.1	Government	40 work days pa
Provider Mandated Costs (all costs outside OIOO, as market entry is voluntary)			
Licensing Fee	-	Government in years 1 and 2, then providers	Cost to be finalised once Oversight Body work concluded
Compliance with Consumer Credit Act	0.15	Providers	£1,225/provider every 5 years
Lodgement and update of EPC register	7.1	Providers	Domestic: £1.15 per plan, Non-domestic: £5.36 per plan
Energy Company Administration Fee	137.5	Providers	1 pence/plan/day (2p/plan/day for small suppliers)
Access to Data Transmission Network	0.3	Providers	£600 pa per provider
Institutional arrangements (in scope of OIOO: costs for central charge database, systems upgrades, Electricity companies collection and remittance of Green Deal payments and installer's share in oversight body)			
Customer statements	69.9	Finance Providers ⁸³	£2/plan pa. £3 on change of ownership
Central Charge Database*	2.9	Energy companies	
Changes to energy company internal systems*	15.1	Energy companies	

⁸¹ £29,600, rounded to £0.0m

⁸² £35,000, rounded to £0.0m

⁸³ This could accrue to Green Deal providers depending on the business model.

Electricity companies collection and remittance of Green Deal payments*	100.7	Energy companies	
Oversight Body *	46.8	Providers, Installers, Advisers	£3 m pa until 2042
	9.2	Government (years 1 and 2)	
Ombudsman Service	1.3	Providers	Average Case Fee £330-350
	0.3	Government (first 2 years)	
Total costs summary			
Total cost to business (excluding assessments)	421.9		
- of which to providers	146.4		
- of which: to other businesses	275.4		
Total cost to Government	23.3		
Total cost of Green Deal mechanism (exc. Assessment costs)	445.2		
Total cost of assessment	1,214.3		
Total cost of Green Deal mechanism	1,659.5		

* costs that are in scope for OIOO calculation.

Assessments

166. Assessments are the gateway to the Green Deal. Many households and businesses can benefit from further clarity on ways to improve the energy efficiency of their property and measures that are suitable. The assessment will provide the estimate of expected energy savings from the installation of energy efficiency measures which will be used by assessors to provide advice to consumers and an indication to Green Deal providers of the maximum amount of Green Deal finance that is likely to be raised. Assessments will be based on an assessment of a dwelling's fabric, using a standardised and impartial tool, as well as an assessment of the occupant's energy demand pattern, to help inform consumer choice.

167. It is estimated that the cost of the fabric component of domestic assessments will be £75, reflecting a slight increase on the current average cost of an Energy Performance Certificate (EPC). Occupancy assessments are assumed to require between one and two hours, costed at £25/hour, with a central estimate of £37.5⁸⁴.

⁸⁴ Rate for the equivalent skill set of a Quantity Surveyor, based on the Standard Cost Model

168. Assessments costs for non-domestic dwellings will vary widely given the heterogeneous nature of dwellings, their use and their inhabitants. Cost estimates are assumed to be the average of assessment costs for small, medium, and large buildings.
169. For non-domestic Green Deals an accredited advisor will assess a property with a standard EPC fabric assessment using the existing Simplified Building Energy Model (SBEM) tool and add actual energy-use data and management performance information to provide a modelled estimate of current running costs. They will also be able to draw in specialists for particular elements where necessary. This will enable a bespoke assessment of prospective fuel bill saving.

Consumer protection

170. The Green Deal includes a number of consumer protection measures which help householders make informed decisions and reduce the risk of sub-standard installations. Consumer protection measures safeguard householders against poor quality workmanship or service at every stage of the customer journey, and thereby support take-up of Green Deal Plans. The following section sets out our consumer protection measures.
171. DECC will fund an Energy Saving Advice Service for three years. This advice service will enable the public to access independent advice on the Green Deal as well as other energy policies such as Feed in Tariffs and the Renewable Heat Incentive. The cost of £12.1 million is based on a projected average of 1.4 million calls per annum.
172. Green Deal customers will be confident that Green Deal assessors and installers have a high standard of competence, with new standards put in place for both, overseen by certification bodies, who themselves must be accredited by UKAS providing for robust quality assurance of the advice and installation services provided under the Green Deal.
173. Advisers will not be certified unless they meet specified training standards set by the National Occupational Standard for Green Deal advisers. Green Deal training costs comprise the additional costs for upgrading skills.⁸⁵ Installers will be required to be certified to meet a new installer standard, developed by industry and BSI (PAS 2030). This is largely based on existing standards and has been aligned as far as possible to the DCLG Competent Person's Schemes to minimise costs on businesses.
174. Sitting above this will be the Green Deal Registration and Oversight Body, which will register and authorise assessors, installers and providers. This body will also monitor compliance to the Code of Practice through risk and random based monitoring and in-situ inspections of work, and mystery shopping to test the whole process. Consumer protection has also been strengthened through a revised policy on assessor impartiality and cold calling, as well as protections for lower than average energy users. Options for disclosure and acknowledgement redress have also been developed, as has the policy on appeals. More detail is set out in the Government Response.

⁸⁵ Source: Sector Skills Council

175. Another important part of consumer protection is disclosure. Primary disclosure refers to the fact that as future bill payers will be responsible for paying the Green Deal charge, they need to know about the Green Deal, and its associated charge, before they take the property. Current owners or landlords of the property will be required to disclose the existence of a Green Deal on that property to any potential future bill payer, and to ensure acknowledgement has been obtained by:

- providing potential future bill payers with a full copy of the EPC for that property at the point of viewing the property, or as soon as an offer is made, whichever is earlier; and
- ensuring that any written contract for sale or rent with the new customer includes an acknowledgment that they will be liable for the Green Deal Plan payments and bound by the terms of the Green Deal Plan.

176. For secondary disclosure, a marker will be added to notifications by Competent Person Schemes, in England and Wales, when measures installed are paid for through the Green Deal. These notifications are sent electronically to the local authority and added to a property's building control file. This will be available on the sale of a property through the normal local authority search – and point out the existence of a Green Deal. Secondary disclosure carries a cost for Competent Person Scheme operators who will need to update their systems to add the Green Deal flag notification to their electronic notifications. We expect this to cost in the region of £34,000. There is also a cost to government from secondary disclosure which could be up to £180,000. Both of these are included in the above table.

Measures

177. The Green Deal assessment is bespoke and takes into account the individual characteristics of the property and its occupants. Our policy is to specify a list of qualifying measures, but not a long list of products that fall within a measure's category. This option has the benefit of setting out clearly the broad scope of the Green Deal but without stifling innovation at the product level. This option will avoid costs associated with creating and maintaining a product list. A statutory instrument will set out the qualifying measures (See Annex J). Following the consultation, the list of eligible measures has been extended from 30 to 45 measures.

178. Products installed with Green Deal finance should be safe, durable and perform as intended. Therefore, there is a need for assurance of product quality as well as performance. The Green Deal Code of Practice will require that all products installed through the Green Deal must meet existing legal obligations such as those set out in Building Regulations and require Conformité Européenne (CE) marking for all products covered by EU legislation. In any event, all products or materials covered by EU legislation relating to CE marking will need to have mandatory CE marking in the UK from summer 2013, therefore the Green Deal does not create additional costs to manufacturers.

179. For measures which consist of a series of components such as external wall insulation, we will require "system testing" to ensure the components work together and certification from a UKAS accredited (or equivalent) facility. This will keep down the cost of warranties and

guarantees and also ensure that Green Deal installations meet the standard already being set in the market.

180. We have included a new provision in the Code of Practice to require that Green Deal Providers confirm with their suppliers that the products to be installed in a Green Deal property are a type capable of – or designed to - deliver the level of fuel bill savings estimated for the “measure” during the Green Deal Assessment. This means consumers can be confident the products installed should deliver the estimated energy savings.
181. The consultation proposed that manufacturers declare in writing their products comply with the Green Deal Code of Practice and register with the Oversight Body. In light of other changes to the Code of Practice and the risk that this approach would contravene EU laws on the requirements to bring construction products to market we have removed this requirement.
182. Spot-checking requirements for products will be combined with the requirement with *in situ* spot checks taking place at the same time as the installation. These will be based on random and risk-based samples.
183. The Green Deal framework should be capable of recognising entirely new measures coming onto the market in an efficient manner. The policy is to use the existing mechanism in SAP and SBEM (Appendix Q) to recognise new measures and add these to the assessment tools and the statutory instrument listing qualifying improvements. The update to the statutory instrument will take place twice a year, rather than annually. This is to enable new measures to be brought to market without having to wait for long periods for this to be legally recognised. Approval and/or appeals process will be created to help administer the process fairly and to review the list.
184. Encouraging innovation in the supply chain is a key policy objective of the Green Deal. Without differentiation between product performance, potentially high performing products may be blocked from being eligible for greater amounts of Green Deal finance. The policy is to use a competitive tender exercise for a contractor to create a process and interface that allows Green Deal suppliers to differentiate the performance of their products. Start-up costs will be funded by the Government. To estimate the cost would prejudice the outcome of the tender exercise. On-going running costs would then be borne by manufacturers, however this process is entirely voluntary.

Mandated costs for providers

185. The Green Deal provider co-ordinates the Green Deal customer journey – responsible for acquiring customers, directing installers, and offering Green Deal finance. The providers cost of doing business adds to the cost of the Green Deal and the costs that will have to be financed by the householder within the Golden Rule.
186. The majority of provider costs will be balanced by corresponding cost reductions elsewhere in the value chain. For example, search costs for customers shift from installers to providers and so these costs do not increase overall. However some provider costs are additional costs mandated by government.

187. Fulfilment of Consumer Credit Act (CCA) requirements will cost £1,225 for a limited company, payable every five years.
188. Key terms of the plan and other basic information relating to the Green Deal will be added to the EPC by providers who will then have a duty to ensure this updated EPC is lodged on the Landmark Register. The cost for each of two filings (one after assessment and one after inception of the Green Deal plan) is £1.15 and £5.36 for a domestic plan and non-domestic plan, respectively.
189. Providers will pay energy companies an annual administration charge for routing payments to finance providers. The consultation Impact Assessment assumed this fee to be £3 per year. However, in the interest of enabling customer switching of energy provider at any point in time and in order to remove a potential barrier to small energy supplier participation in the Green Deal, it will now be 1p/plan/day, with small energy suppliers receiving 2p/plan/day.
190. Providers will also pay for access to the Data Transmission Network (annual base fee of £480 and an additional variable fee estimated at £120⁸⁶).
191. The consultation proposal was for providers to issue product warranties for the entire repayment period of each Green Deal measure. Although this would provide customers with the greatest certainty that costs will be offset by savings throughout the life of the plan, it added significant costs to many measures. It has been important to strike a balance between ensuring the necessary standards of customer protection whilst not loading disproportionate costs into the mechanism, creating a barrier to uptake and entry into the Green Deal market. Green Deal Providers will now be required to offer product warranties for a mandatory five year period. In addition, Green Deal providers will be required to offer 10 year cover for consequential building damage which may arise as a result of the measures or their installation. These mandatory requirements will apply to all measures except SWI and CWI which will require a 25 year product warranty and 25 years of consequential damage cover. The market already provides cost-effective warranties for these measures and Green Deal Providers could make use of these as part of their customer offer if they meet the requirements in the Code of Practice and Framework Regulations. The range of insurance rates for all measures has not yet been determined. An illustrative cost is based on the projected take-up of boilers.
192. The consultation also proposed that Green Deal providers have a surety bond in place in order to continue to fulfil Green Deal provider obligations in the event of insolvency or loss of authorisation. Feedback from the consultation indicated this would be very costly, especially for smaller Green Deal providers, and may create a barrier to market entry. We will, therefore, remove this obligation and make provision in the Framework Regulations and the Green Deal Arrangements Agreement to ensure that, if the Green Deal Provider ceases to be authorised or

⁸⁶ The variable fee is £2,000/gigabyte.

is wound up, the most important ongoing obligations of the provider continue to be carried out by the person who is entitled to payments under the plan and customers can still, in appropriate cases, seek redress under the Green Deal legislative framework for failures of the Green Deal Provider (or its assignee). This will reduce costs and barriers for providers wishing to enter the market whilst still ensuring appropriate levels of customer protection.

193. The requirement for Green Deal providers to have an independent conciliation service has been removed. Responses to the consultation suggested this would duplicate the ombudsman functions and add unnecessary cost.

194. Customers will receive an statement of outstanding balance annually and on change of ownership in a dwelling. It is assumed these statements will be issued by finance providers.

Institutional arrangements

195. Green Deal plan data will be held in a central location accessible to providers. Electricity companies will bear the estimated cost of £2 million (plus running costs) for creating this infrastructure. The cost estimate is based on industry sources.

196. Energy companies will need to adjust their settlement systems for booking householder payments, handling customer queries and managing delinquent debt. Cost estimates are based on stakeholder information and take into account the expected trajectory of Green Deal take-up.

197. An oversight body will authorise Green Deal providers, supervise the Green Deal market and monitor whether the market functions smoothly. The Oversight Body will be outsourced to the private sector through a tendering process to ensure value for money. DECC will fund the Oversight Body's set-up costs and the first two years of running costs. This will encourage early registration by removing costs to entry and allow DECC to monitor performance and establish a level of fees the market might support. The Green Deal Ombudsman will intervene when consumers feel things have gone wrong. Government will pay for the set up costs, and the fixed running costs for the first two years. Any case fees will be paid by Green Deal providers, at the outset. The actual case fees payable by the Green Deal providers will be based on a tiered system and will depend on the complexity of cases.

198. The consultation position was to extend the range of responsibilities of the Energy Ombudsman Service. However, this would have entailed an amendment to primary legislation which could not have been made in time for when the Green Deal framework becomes operational. Therefore it has been decided to create a dedicated Green Deal ombudsman.

Green Deal charge

199. The consultation asked about the desired level of flexibilities in Green Deal interest rate structures in the domestic sector. A review of consultation responses has led to rejecting the

option of permitting indexed linked interest rates because an overwhelming majority of respondents preferred the simplicity of a fixed rate deal.

200. Therefore Green Deal providers will be limited to only offering Green Deal plans with a fixed interest rate to domestic customers. However, in order to capitalise on some of the expected increase in savings, providers will have an option to uplift the charge by 2% each year. If Green Deal providers choose to utilise the 2% uplift, the instalments under the Green Deal plan will still be fixed at the outset. This provides customers with certainty regarding their payments whilst enabling more measures to meet the Golden Rule, because the total amount of finance initially offered will be greater. (see annex G for further detail). The same restrictions will not apply to non-domestic Green Deal plans.

9. ECO mechanism costs

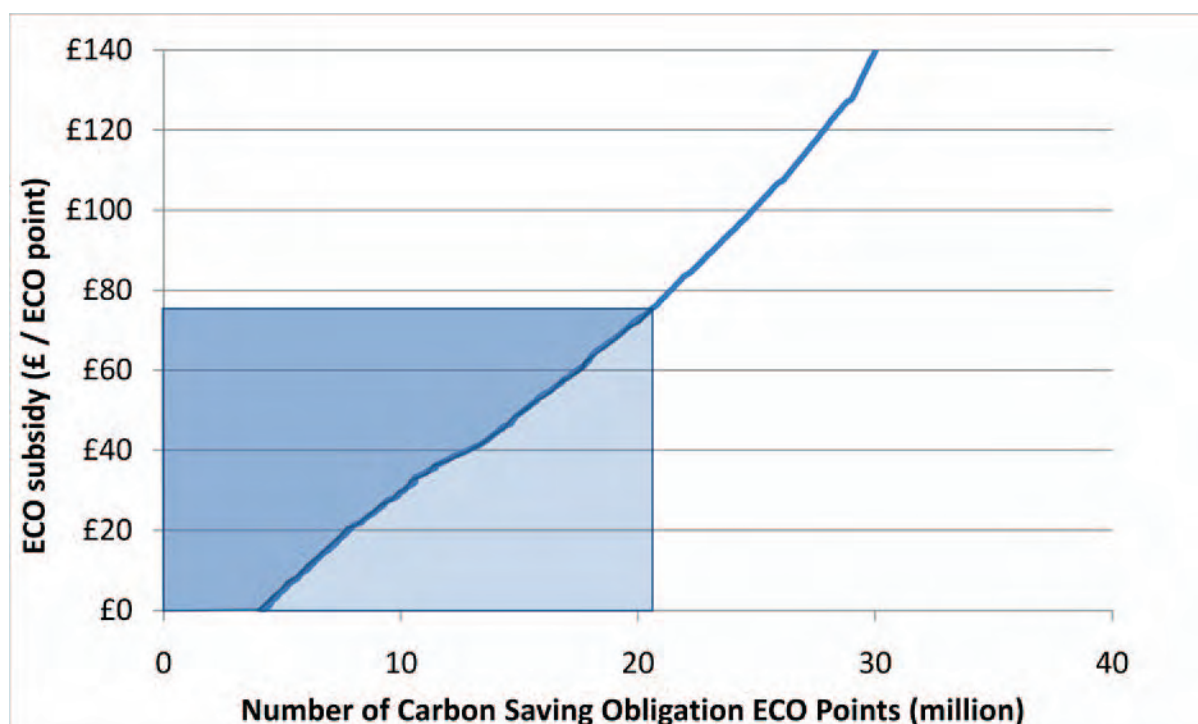
201. This section provides an assessment of the costs of the ECO, and an explanation of the distributional implications of a supplier obligation. The cost estimates presented here are those that are additional to the Green Deal Mechanism costs described in section 8 and are reflected in the overall cost benefit analysis presented in the Aggregate Impacts section.

9.1 ECO points

202. The installation of energy efficiency or heating measures which are within the scope of the carbon targets or the Affordable Warmth target will generate credits, or 'ECO points' (see Annex H for ECO eligible measures and target metrics). Energy suppliers must obtain sufficient ECO points to meet their obligations. Suppliers will be able to generate ECO points through their own installation activities. However, it is expected that, as with previous obligations⁸⁷, there will be a market for ECO points where suppliers contract with installers for ECO points. A further consultation on the ways in which ECO brokerage could be used to help the market to develop efficiency will be undertaken in Summer 2012.
203. Placing an obligation on energy companies to deliver ECO points creates a demand. The market demand for points will be fixed at the level of the ECO target and will be perfectly inelastic. That is, energy companies will be willing to pay any reasonable price to generate or buy ECO points in order to avoid the cost of a penalty for not meeting their obligation.
204. The market supply curve for ECO points represents the relationship between the number of ECO points and the marginal subsidy required per ECO point to create demand for the measures that generate them. Some measures can generate ECO points at low cost in receptive households. However, the more ECO points that must be generated, the more that either higher cost measures or measures for which there is greater consumer aversion will have to be installed (or both). The upward slope of the ECO point supply curve (see Figure 33) reflects the increasing requirement for subsidy to persuade households to install measures as carbon savings ambition increases. The curve reflects amongst other factors, consumer differences in willingness to pay for identical measures, differences in cost-effective ECO point potential across houses, and differences in suppliers' costs of installing identical measures.
205. The marginal cost to installers or suppliers of generating an ECO point is determined by the intersection of the supply and demand curves for ECO points. The subsidy required to deliver the last ECO point should determine the market clearing price for all ECO points. The brokerage should provide a transparent signal to market participants of the marginal cost of generating ECO points.

⁸⁷ Evaluation synthesis of energy supplier obligation policies, DECC, 2011, <http://www.decc.gov.uk/assets/decc/11/funding-support/3340-evaluation-synthesis-of-energy-supplier-obligation.pdf>

Figure 33 Central scenario ECO point supply curve and the cost of ECO (for first interim period)



206. For the energy suppliers, the total cost of the ECO is the size of the obligation (the total number of ECO points) times the market clearing price for ECO points (marginal subsidy cost (£/ECO point) of the last unit of carbon abatement) This is represented by the shaded blue rectangle in Figure 33). These costs will either be the costs of contracting for ECO points through the brokerage or the subsidy cost of promoting and installing the measures through their own activities. The costs of the ECO to suppliers, in the Aggregates Impact section are calculated in this way.

207. The ECO obligations are quantity targets, requiring a given level of savings to be achieved. Until the ECO becomes operational there is uncertainty over what the market clearing price will be. The price will be determined by a range of factors including fossil fuel prices, technology costs and consumer preferences. In the different modelling scenarios the costs to energy suppliers of meeting the obligations varies, this is explored in more detail in the Aggregate Impacts section. The costs to energy suppliers, under central assumptions are shown in Table 16 below.

Table 16 ECO costs of driving installations

ECO costs to energy suppliers of driving uptake of measures ⁸⁸	
ECO Carbon Savings targets, of which:	£950m p.a.
<i>Carbon Saving Obligation</i>	£760m p.a.
<i>Carbon Saving Communities (including Rural Safeguard)</i>	£190m p.a.
ECO Affordable Warmth obligation	£350m p.a.

⁸⁸ Including contribution to the installation costs, subsidies to overcome demand barriers and hidden costs

208. In a competitive installation market, households are aware of the value of the ECO points generated by installing their measures in their homes and installers compete for work. Under these conditions, the value of the ECO points should be passed through to householders as subsidy. Those householders who are most willing to install measures, or who have some of the most cost-effective potential (positioned left on the ECO point supply curve in Figure 33) would have required no or little minimum amount of subsidy to be persuaded to install a measure. The subsidy they actually would receive could be greater, however. These householders can capture some additional subsidy *above* their reservation subsidy level up to the ECO point market clearing price. For some of the most cost-effective measures, the subsidy offered is expected to exceed 100% of the installation cost.
209. In this competitive installation market, the darker shaded triangle areas in Figure 33 illustrates the ECO subsidies that are given to householders that exceed their reservation subsidy levels. The more the marginal cost of meeting the ECO target increases, the greater this proportion of the ECO subsidy that will be "additional subsidy" above these reservation levels.
210. In some instances, installers may be able to generate demand for ECO measures while offering a subsidy below the market's marginal subsidy rate. This is most likely where householders do not get multiple quotes for installing measures. In these instances installers will capture some of the additional subsidy for the ECO points the installations generate. While it is likely that this will happen to some extent, and that it would reduce the cost to business of the ECO, a conservative assumption has been made for the OIOO calculations that all the additional subsidy is passed through to householders.

Cost pass through

211. In a competitive market, it is profit maximising for the energy suppliers to charge all their customers the marginal cost of supply. The ECO will impose costs on suppliers to meet the obligation. These costs increase the marginal cost of companies to supplying a customer with energy. The cost to companies of supplying a unit of energy will be increased by the marginal cost of generating the ECO points that a suppliers' ECO obligation is increased by for each KWh they supply.
212. Companies pricing decisions and pass-through of costs are commercial decisions. In the absence of evidence from companies on their pricing behaviour, it is assumed that energy suppliers will pass through the full cost of meeting the obligation to their consumers. DECC has anecdotal evidence to suggest that energy companies do this. They cost environmental policies at marginal cost, and fully pass through the cost of policies. There are no qualitative reasons to suggest why companies will not treat environmental costs in the same way as any other cost of production in this respect.

Administrative costs

213. Energy suppliers will face administrative costs associated with the ECO, over and above the administrative burden of the Green Deal. Suppliers will need to have the staff as well as monitoring and reporting structures in place to comply with the obligation, and familiarise themselves with the obligation. These costs are discussed below.

Table 17 Estimated ECO administrative costs to energy suppliers

ECO administrative costs to energy suppliers (PV)	
Carbon obligations	
Monitoring/reporting set up costs	£27,000
Familiarisation costs	£16,000
Recurring administration costs	£890,000
Affordable Warmth obligation	
Fixed costs	£7.9m
Variable costs	£7.4m
Total ECO administrative costs	£16.3m

214. Energy companies are reluctant to provide estimates of administrative costs associated with supplier obligations for commercial reasons. Evaluation of existing supplier policies like CERT and CESP, and the Green Deal and ECO consultation, have provided little guidance as to what these costs are. The estimated admin costs presented here are therefore uncertain, but guided by costs reported by of the administration of other schemes and informed by engagement with energy suppliers.
215. Energy suppliers are likely to incur one-off costs associated with changes to e.g. **reporting requirements under ECO** from existing schemes, for example by investing in new software. The exact amount will depend on the ECO administrators reporting requirements, but is expected to be modest given that the obligated suppliers will have existing reporting requirements under the CERT extension. The set up cost is estimated at around £27,000⁸⁹.
216. Suppliers will also face a one-off cost associated with time spent on **familiarisation** with the ECO scheme. This is likely to include time spent for employees to understand the new framework, and explain this to the companies' senior directors. The prior existence of CERT and CESP is likely to mean that this cost is relatively modest, and is estimated at around £16,000 for the obligated companies⁹⁰.
217. There are likely to be **recurring administration costs** associated with reporting and all other administration activities associated with the carbon targets. The reporting requirements of ECO has not yet been determined, therefore these costs are uncertain. It has been assumed that the estimated annual reporting costs are similar to those assumed under CERT, at around

⁸⁹ This is calculated as 25% of the annual administrative costs of around £107,000, in accordance with the Standard Cost Model guidance.

⁹⁰ It is assumed that each obligated company will require eight person days at a cost of £336 per day. This estimate represents the approximate value of management time and associated overheads (Standard Cost Model wage code 111). £336 per day *8 days*6 companies =£16,128.

£64,000 per year⁹¹. Beyond the reporting costs, it is assumed that there will be admin costs of three employees per obligated company, who will take fifteen days per year to undertake administrative duties associated with the targets at an hourly rate of around £21. This adds an extra £43,000 per year, giving a total annual administrative cost of £107,000 per year. This gives a present value of around £890,000. Companies could choose to meet their obligation by trading on the brokerage, contracting with external providers or promoting the delivery of measures through their own delivery arms. The cost to companies of providing subsidies to deliver measures is captured in Table 16 above. Companies could incur some overhead costs if they contract ECO delivery out of house. However, these costs are expected to be outweighed by the benefits to them if they chose to deliver their obligation through this route. Government will be seeking evidence on the costs and benefits of an ECO brokerage platform in a Summer 2012 consultation.

218. Energy Companies would also incur administration costs for the **Affordable Warmth** target. These are estimated in two components: a) a fixed time cost for participating energy suppliers associated with managing and administering the installation of measures to achieve the target; and b) a variable cost associated with handling phone calls from householders identifying themselves as eligible for assistance under the target and verifying these households.
219. The fixed time cost component is calculated by taking an estimated profile of staff members required to administer achievement of each participating supplier's target, and applying indicative salary rates to each member in order to estimate the opportunity cost of their time. On average this is equivalent to just under 4 Full Time Equivalents (FTEs) per participating supplier, per year of the scheme, valued at a weighted average salary cost of circa £38,000 per FTE. This results in an estimated annual time cost across all participating suppliers of £910,000 per year. In the first year of the scheme only, additional setup time costs are also calculated, in the same way, by taking an estimated 1 FTE and valuing the time with a weighted average value of circa £70,000 per FTE. This results in an estimated one-off setup cost across all participating suppliers of £385,000. The present value of the fixed element is £7.9m.
220. The variable cost associated with phone calls is estimated by applying estimated time and resource costs of processing a phone call to the total number of measures that are estimated to be installed in each year of the scheme under the Affordable Warmth target. 30% of these phone calls are also assumed to require a follow up call. The capital costs of running a call centre are assumed to already have been incurred, and are therefore sunk costs that are not attributable to the ECO. Under the central working option, around 105,000 households are estimated to have measures installed on average in each year of the scheme (adjusted to account for some households potentially receiving more than one measure). Applying a 30% uplift results in an estimated 135,000 phone calls per year, which are then valued using an average cost of £7 per phone call.⁹² This results in an average annual cost of handling phone calls of around £1m across all participating suppliers per year giving a present value of £7.4m.

⁹¹ £59,000 per year (2009 prices) reporting costs assumed in the CERT assessment

<http://www.decc.gov.uk/assets/decc/consultations/certextension/121-iacertextension.pdf>

⁹² Cost estimate based on previous experience of schemes targeted at low income and vulnerable households.

Costs of the ECO administrator

221. There will be costs to Government associated with the ECO administrator, however, the final arrangement and appointment of the administrator is yet to be confirmed and we therefore do not have actual cost estimates. For the purpose of this assessment, it is estimated that there will be a one-off cost of around £1.3m associated with setting up the ECO administrator, and that the administrator's annual operating costs will be around £2.5m per year. The set-up costs are based on cost estimates of setting up CESP, and the operating costs is the estimated combined cost of operating the CERT and CESP.

Table 18 ECO administration costs to Government

ECO costs to Government – administration (PV)	
ECO administration	
Set-up costs	£1.3m
Operating costs	£20.8m
Total cost to government	£22.1m

222. Costs to government of the brokerage administrator will be assessed in the Summer 2012 brokerage consultation.

10. Wider Impacts

10.1 Health impacts

223. Living in cold conditions is linked to a number of detrimental physical and mental health impacts. A number of studies have concluded that inadequate levels of heating and other factors associated with fuel poverty are linked, in particular, to respiratory problems in children and an increased risk of mortality in older adults.⁹³ Other sources also highlight the risk of respiratory problems among adults and the potential development of influenza, pneumonia and asthma, alongside an increased risk of arthritis and accidents at home linked to poorly heated housing.⁹⁴
224. However, there has also been some recent discussion suggesting that the reduction in permeability in homes could lead to higher levels of toxic particles in the home.⁹⁵ This could have long term negative health impacts, for example lung cancer (radon), stroke or heart attacks (second hand smoke) and respiratory illness for children (mould). This potential impact on health as a result of energy efficiency measures has had limited discussion to date, but the current evidence suggests that the majority of the impact can be resolved by ensuring that alternative forms of ventilation are installed alongside energy efficiency measures to create the appropriate level of permeability in the home.
225. Specific targeting of measures at low income and vulnerable groups would be expected to have a greater health impact, as these groups are more likely to under-heat their homes and/or be more susceptible to the negative health consequences of living in low temperatures. The greater ability of households to adequately heat their homes, while also reducing the amount of energy needed to do so, is likely to result in a number of households increasing the average temperature in their homes. It is expected that this would reduce the risk of the health impacts of living in cold homes and poor housing conditions.
226. Estimating the precise health impact of installing heating and insulation measures is problematic due to uncertainties around which households will receive a measure(s), how their use of energy will change as a result, and the condition of the property they live in. As a result, there is currently no set methodology for estimating and attributing health impacts of the installation of heating and energy efficiency measures, and any resulting increase in indoor temperatures. Consequently, it has not been possible to estimate the impact of the Green Deal and ECO at present.

⁹³ For example, Green, G. and Gilbertson, J. (2008). *Warm Front Better Health: Health Impact Evaluation of the Warm Front Scheme*. CRESR; Wilkinson, P. et al (2001). *Cold Comfort: the social and environmental determinants of excess winter deaths in England, 1986-96*. Policy Press; The Eurowinter Group (1997). Cold exposure and winter mortality from ischaemic heart disease, cerebrovascular disease, respiratory disease, and all causes in warm and cold regions of Europe. *The Lancet*, 349, 1341-1346.

⁹⁴ Liddell, C. and Morris, C. (2010). Fuel Poverty and Human Health: A Review of Recent Evidence'. *Energy Policy*, 38(6), 2987-2997.

⁹⁵ Wilkinson, P. et al (2009). Public health benefits of strategies to reduce greenhouse-gas emissions: household energy. *The Lancet*, 374(9705), 1917-1929.

227. DECC is currently developing a model which aims to estimate the mortality, morbidity and mental health impacts associated with heating and energy efficiency measures. This area of analysis is still in development and therefore it has not been possible to generate estimates of health impacts of the policies at this stage.

10.2 Sustainability

228. The idea of sustainability is for the current generation to live within its means, so that the well being of future generations is not negatively affected by its actions. A key aim of the Green Deal is to reduce energy consumption in order to meet the UK's Carbon Budgets, which set a ceiling on the amount of GHGs emitted during each five-yearly budget period to 2050. The benefits of this should help address dangerous climate change, which would affect future generations disproportionately.
229. Other sustainability benefits of the policy would be a reduction in the use of non-renewable inputs in the energy generation process and gas supply, and less water usage in the generation of steam for electricity generation. These benefits have not been quantified in this IA and have thus conservatively been omitted from the cost benefit analysis.

10.3 Equality impact assessment

230. This section of the IA provides an assessment of the Green Deal and ECO policy against the protected characteristics of age, disability, gender, gender-reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief and sexual orientation, as specified in the Equality Act 2010, and outlines where changes have been made to ensure all opportunities to promote equality are taken. Where a particular protected characteristic is not listed below for a policy sub-heading, it is because there is no evidence that people with this protected characteristics are more or less likely to benefit from the policy or are discriminated against by the policy.

Impact of Green Deal on protected groups

231. The Green Deal will be available to all householders provided they are connected to the electricity grid. The Green Deal will not discriminate against any of the protected groups covered by the Act. All Green Deal customers will have an assessment of their property carried out first in order to determine which energy efficiency measures are appropriate for them before any finance arrangements can be taken out. Customers will be free to use the Green Deal assessment and shop around for the best deal from a Green Deal provider.

Age and disability

232. The Government will introduce the Energy Saving Advice Service (ESAS) to ensure that all potential Green Deal customers have access to a source of impartial advice. The ESAS contract requires telephone, email and digital functions to be an accessible service for all customer journeys and that resources should be supplied in accessible formats e.g. Braille and large print. The decision to have a telephone helpline could be particularly important for the disabled on low incomes unable to operate or install the internet, or for older people as adults aged 65 and over make up almost two-thirds of those individuals who have never accessed the Internet.

Religion or belief

233. If the Green Deal charge has interest added to payments then this could potentially have an impact on some religious groups, such as the Muslim community, who do not want to handle interest payments since it may be prohibited by their faith. However, the repayment structure for the Green Deal is for the market to configure within the constraints of the legislation, the legislation does not require the payment of interest as part of the repayments. The flexibility built into the legislation will allow Green Deal providers to develop products, and repayment structures, to suit the needs of different customers. If there is a market for this it is likely to include Sharia compliant products. Providing a Green Deal product in line with such principles might increase costs to Green Deal providers, which could be passed on to these, and other, customers.

Impact of Affordable Warmth (AW) obligation on protected groups

234. The AW obligation will be focussed on the vulnerable and low-income and will have specific eligibility criteria. Its purpose would be to ensure help is available to those who most need assistance to reduce the cost of heating their homes, and to those who might not achieve significant energy savings and are therefore unlikely to take up Green Deal finance.

Age

235. The AW obligation is expected to have a positive impact on some age groups, and a potentially negative impact on others. The eligibility criteria for AW support has been expanded following the consultation. Households which include a person receiving working tax credit and qualifying element, or child tax credit with a household income lower than £15.860k, pension credit or one of the eligible means tested benefits and qualifying criteria (including those with a child under 16 years old or 19 years old or under in full time education), will be eligible for AW support. Households that are not eligible for AW will not receive measures but would face the costs associated with meeting the obligation which will be passed on by energy suppliers.

Disability

236. The AW obligation is expected to have a positive impact on disabled people who are on low incomes. Households with an occupant in receipt of both disability and income related benefits will be eligible for affordable warmth support. On the other hand those with a disability who do not claim income related benefits will not be eligible for AW support but still face the costs of ECO that are passed on through energy bills.

Pregnancy and Maternity

237. The AW target is expected to have a positive impact of recent mothers on low incomes. Households on income related benefits with a child under 16 or in full time education up to the age of 19 will be eligible for affordable warmth support, and so will be proportionately more likely to benefit.

Impacts of Carbon Saving Obligation on protected groups

238. The Carbon Saving Obligation is not expected to discriminate against any group, although some groups may be more likely to receive support than others. For example, as illustrated in Table 19 below, households with one occupant over 65 years old or with a disability could be

slightly less likely to benefit from the obligation given its focus on insulating solid wall and hard to treat cavity wall properties. However, there are a wide range of other factors that will affect uptake of energy efficiency measures.

Table 19 Number of households with at least one occupant over the age of 65 years and over, 5 years old and under or with a disability in a solid wall or cavity wall property⁹⁶

	Cavity with insulation (thousands)	Cavity uninsulated (thousands)	Solid walled property (thousands)	Total
Total number of households in England	7,417 (33% of total)	8,073 (37%)	6,748 (30%)	22,238
65 years and over	2,594 (44%)	1,866 (31%)	1,453 (25%)	5,913
5 years old and under	758 (29%)	995 (38%)	862 (33%)	2,615
HRP or partner registered disabled	913 (48%)	526 (27%)	473 (25%)	1,912

10.4 Rural Impacts

239. DECC is committed to considering the impact to rural people and places in developing and implementing fair and effective policies. The Green Deal and ECO have primarily been designed to incentivise Energy suppliers and the Green Deal market to install energy efficiency measures where it is most cost effective for society. Consideration of the rural impacts of the Green Deal and ECO will be an ongoing process and will not stop at the policy design stage. The evaluation strategy will also seek to ensure the policy is effective in rural areas.

240. Installation costs are, on average, likely to be higher in rural locations⁹⁷ because the properties are often hard to treat and more dispersed, with less opportunity for benefiting from economies of scale. Many (38% of the 4m)⁹⁸ rural properties are off gas grid, though, which will typically increase the bill and carbon savings from installing measures in them. This improves the cost-effectiveness of installations, and therefore increases the likelihood that these properties will be targeted as part of a least cost way to meet the ECO obligations. Alongside this natural incentive to target off grid gas properties, suppliers will be required to deliver 15% of their CSC target to low income rural households.

⁹⁶ Energy use in English homes 2011

⁹⁷ However, it should be noted that some urban areas, such as central London, also have many hard to treat properties.

⁹⁸ English Housing Survey: Housing Stock Summary Statistics 2009

(<http://www.communities.gov.uk/documents/statistics/pdf/19372481.pdf>)

241. A high proportion of rural properties are harder to treat (29% SWI, 20% HTT CWI)⁹⁹. ECO will focus on these hard to treat measures so more installations in rural locations are expected than under previous policies. The policy has also been designed to increase the take up of cost-effective rural opportunities. For example, the trading of points through the ECO brokerage should make it easier for local installers in rural locations to gain access to ECO subsidy.
242. Around half of the cost of the ECO are likely to be passed on to consumers through gas bills, so rural properties that are not connected to the gas grid will experience less impact to their total energy bill as a direct result of ECO.

10.5 Competition impact assessment

243. The Green Deal and ECO policy introduces a new market mechanism for the installation of energy efficiency measures in which competition will play a central role. This section of the IA provides an assessment of the overall impact on competition of the policy in accordance with OFT guidance¹⁰⁰.

Does the policy directly limit the number or range of suppliers?

244. The Green Deal legislation will affect the range of suppliers competing in the market through the creation of The Green Deal Finance Company, the accreditation process and the possibility of social housing providers becoming Green Deal providers.

Green Deal finance Aggregator

245. One of the most effective ways to reduce the cost of capital to the Green Deal Providers who will provide finance to consumers is through the creation of a financing/ aggregation vehicle that would achieve enough scale to access the cheapest available funds on the capital markets. We are aware of at least one private sector led organisation with significantly advanced plans to do this. It could be argued that the creation of one special purpose vehicle to serve the majority of the provider market would potentially limit competition and possibly reduce financial innovation. However, without a central vehicle to aggregate Green Deals and achieve the scale required to access the capital markets, it is likely that competition in the provider market would suffer. Providers would have to develop their own finance solutions, or carry the liability on their own balance sheets. This is something that smaller and medium-sized providers in particular may find it difficult to do.

Accreditation of assessors, installers and products

246. The accreditation of advisors, installers and products will not substantially extend the level of accreditation developed and adhered to by industry, but consolidates the requirements and standardises accreditation, strengthening consumer confidence in the sector. For example:
- There is already a competitive market for assessors of domestic buildings created through the implementation of the EPC which the Green Deal draws on;
 - A number of installer certification bodies already exist as a form of self regulation to overcome adverse selection problems in the market; and

⁹⁹ English Housing Survey: Housing Stock Summary Statistics 2009
(<http://www.communities.gov.uk/documents/statistics/pdf/19372481.pdf>)

¹⁰⁰ See http://www.offt.gov.uk/shared_offt/reports/comp_policy/oft876.pdf

- Accreditation requirements for products will largely draw on requirements set out in building regulations or EU legislation which suppliers are familiar with.

247. Only accredited Green Deal advisors and installers are able to participate in the scheme. Whilst this will limit who can supply the market, there is still likely to be a sufficient number of companies for the markets to be competitive. DECC will be fully funding the oversight body in years 1 and 2. This will remove additional oversight registration costs for business in the first two years while the market establishes and allows businesses to assess the actual costs and benefits from joining. For the product market, the targeting of the ECO may distort the market as products which do not receive ECO support will look less attractive to Green Deal customers. However, there is likely to be a sufficient number of suppliers of each type of measure for the market to remain competitive.

Does the policy indirectly limit the number or range of suppliers?

248. The Green Deal could indirectly limit the number of suppliers if its costs affect some suppliers more than others. Imposing higher fixed costs relative to variable costs increase the economies of scale for those operating in the market, which places smaller firms at a disadvantage.

Green Deal Providers

249. The overriding constraint on an organisation becoming a Green Deal provider is the ability to access and structure long term finance to fund the installation of measures, or to hold Green Deal finance plans on their balance sheet. There a number of other requirements on Green Deal providers, the overhead costs of which increase could place smaller firms at a competitive disadvantage.

250. Given that a large number of expensive measures such as SWI require ECO subsidy as well as Green Deal finance, the small number of energy suppliers who will be responsible for meeting the ECO could have a large influence on the Green Deal and ECO market. For example, many energy companies are expected to become Green Deal providers, and could choose to channel ECO subsidy through their own Green Deal provider business. If other Green Deal providers are unable to access and channel ECO subsidy to their customers they will be at a competitive disadvantage. A further consultation on a brokerage platform to open up the market for ECO subsidy will be published in Summer 2012.

Energy supply market

251. Under the Green Deal, smaller energy suppliers are able to choose whether to opt into the repayment collection system. This gives small firms the opportunity to avoid the costs of the system, which might place them at a competitive disadvantage because of the fixed costs of establishing systems for administering repayments. Those that choose to opt out would be unable to supply energy to Green Deal customers. However, the fact that firms are able to choose whether to be part of the Green Deal system means competition in the energy market is unlikely to be affected.

252. Smaller suppliers (fewer than 250,000 customers) are exempt from having to participate in the ECO and the obligation will be tapered for smaller suppliers who pass through the 250,000

customer account threshold. This will reduce the barrier to growth associated with the current supplier obligations whereby a smaller supplier passing through the threshold is required to meet an obligation equal to their total market share.

Assessment markets

253. Green Deal providers may choose to employ authorised energy advisors to carry out Green Deal assessments for potential customers. Qualified and authorised advisors will be required to inform customers if they work for a Green Deal provider before they carry out an assessment, so the consumer is aware before the visit takes place. The assessment and recommendations will be produced using the approved methodologies and the outputs recorded for quality assurance purposes. Customers would also be free to use a Green Deal assessment to shop around for the best deal. These requirements would maintain competitive pressure in the market.

Energy Service Contract and Energy Performance Contract suppliers

254. Green Deal providers will provide some of the measures that are currently supplied by Energy Service Companies (ESCs) and Energy Performance Contract (EPCs) suppliers. The benefits to Green Deal providers of the Green Deal accreditation schemes and their ability to attach repayment plans to electricity meters could place them at a competitive advantage to ESCs and EPCs. However, these firms would be able to become Green Deal providers themselves and will continue to provide a range of energy management services not available from Green Deal providers. Commercial organisations are therefore likely to continue to see the benefits of employing ESCs and EPCs to manage their energy use.

Does the policy limit the ability of suppliers to compete?

255. Some aspects of the Green Deal legislation raises the costs of innovation and so reduces their ability to compete. However the net effect on innovation, and competition, in the market is expected to be positive.

Energy efficient product market

256. New products that deliver higher energy savings need to go through an assessment process before their superior quality can be accounted for in repayment calculations. The product assessment procedure includes a process for fast tracking new products to reduce costs to suppliers. New products that do not fall into the broad categories of measures used in the SAP have to go through a testing process. This can cost around £25,000-£30,000 and take 6-12 months. New SWI systems are likely to need to go through this process.
257. The need for products to undergo assessment to gain the benefits of better performance, and the need for new measures to be included in the SAP, increases the costs of bringing new products to market. Higher innovation costs reduces competitive pressure in the market. However, overall the Green Deal encourages innovation in the sector by increasing the size of the market.

Does the policy reduce suppliers' incentives to compete vigorously?

258. The Green Deal legislation would not reduce suppliers' incentive to compete.

Energy suppliers

259. Energy companies are likely to be able to pass on the costs of the ECO to energy consumers. An energy company with higher prices than its rivals will lose market share as customers switch to other suppliers. Energy companies therefore have a strong incentive to keep the costs of their obligations as low as possible in order to minimise the impact on energy prices.
260. Collection of Green Deal repayments through energy bills requires an additional process to be in place to manage a consumer switching from one supplier to another. This is done automatically by the energy suppliers concerned, using the customer switching processes already in place so is not expected to affect their ability or incentive to switch energy supplier.

Green Deal Provider market

261. The information energy companies hold about their customer may give them a competitive advantage in the provision of Green Deal plans. The legislation therefore provides powers for generic promotion of the Green Deal by all energy companies, which should reduce this competitive advantage. In addition, other Green Deal providers are expected to develop customer acquisition processes, such as cross-selling Green Deal plans with other renovation work.

Small Firms Impact Assessment

262. The assessment above identifies the key competition impacts on small firms and how the Green Deal and ECO have been designed to facilitate, as much as reasonably possible, entry of small firms. There are some design aspects which will limit a small firms ability to compete, but these have been introduced to ensure the policy meets its central aims, as set out in section 3.

Microbusiness exemption

263. As noted above, the close integration of the ECO and Green Deal Finance create a clear rationale for adopting the same standards of certification for participants in both schemes. To this end, we will require all ECO installers to comply with the Green Deal Code of Practice and the relevant requirements set out in the Publicly Available Specification 2030 (PAS 2030).
264. In practice, the certification requirements for installers under the ECO and Green Deal will broadly mirror those of the CERT and CESP schemes. The only additional requirement on businesses will be to read the relevant sections of the Code of Practice and to subscribe to PAS 2030. These costs are captured in Table 15 which covers all costs associated with the Code of Practice and other accreditation requirements). In total, it is estimated that the new requirements could lead to a modest one-off cost to microbusinesses of £75 per CWI and SWI installer. This equates to a total cost of £15,375 across all 205 microbusiness installers¹⁰¹. It is also important to note that, as the number of remaining unfilled lofts and wall cavities diminishes, companies should naturally begin to diversify into other areas of the energy efficiency market.

¹⁰¹ This is based on figures provided by stakeholders that there is likely to be around 60 SWI installers operating under Green Deal and ECO, of which 40 will be microbusinesses, and 205 CWI installers, of which 165 will be microbusinesses.

265. The estimated costs are small in comparison to the size of risks they mitigate and the overall importance of the accreditation framework to Green Deal. Consumer confidence in the Green Deal will be vital if it is to encourage significant take-up of energy-efficiency retrofitting. A strong accreditation framework will help ensure that consumers can have confidence in the products and services they receive without worrying about the risks of rogue businesses. This view is reinforced by the lessons learnt from insulation delivery programmes in Australia, where poor quality installations led to fires and serious injuries.

11. Glossary of Abbreviations and Acronyms

AW	Affordable Warmth obligation
BAU	Business As Usual
CERT	Carbon Emissions Reduction Target
CESP	Community Energy Saving Programme
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide equivalent
CS	Carbon Saving obligation
CSC	Carbon Saving Communities obligation
CWI	Cavity Wall Insulation
DECC	Department of Energy and Climate Change
ECO	Energy Company Obligation
EPC	Energy Performance Certificate
GDF	Green Deal Finance
ETT CWI	Easy to Treat CWI
HTT CWI	Hard to Treat CWI
IA	Impact Assessment
LI	Loft Insulation
MACC	Marginal Abatement Cost Curve
NPV	Net Present Value
PRS	Private Rental Sector
RdSAP	Reduced Data Standard Assessment Procedure
SAP	Standard Assessment Procedure
SBEM	Simplified Building Energy Model
SWI	Solid Wall Insulation

Annexes

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Annex A: Analytical Assumptions

This annex sets out all the analytical assumptions used in the domestic and non-domestic modelling including energy savings from measures, technical potential, costs and carbon intensity.

Green Deal Household Model Inputs

Technical Potential

Technical potential is the number of houses in GB where it seems technically possible to install measures. Published DECC energy efficiency statistics were used to estimate the remaining potential in September 2011. From these numbers, the likely activity in the Carbon Emissions Reduction Target (CERT) was subtracted to give an estimate for the start of 2013. CERT activity was estimated using the Final Option illustrative mix from the June 2011 Impact Assessment on the exclusion of electronics and appliances from the CERT extension. It was assumed that CERT extension activity was likely to have commenced after October 2010.

Table 20 summarises the estimated outstanding carbon abatement potential as of 2013, assuming there is no abatement activity during this period. This table is consistent with the 2013 MACC chart in chapter 5 of the main IA report.

Table 20: Breakdown of carbon abatement by measure

Measure	Abatement Potential (MtCO ₂)	% of total
Solid wall insulation	5.7	60
Cavity wall insulation (hard to treat)	1.5	16
Cavity wall insulation (easy to treat)	1.2	12
Loft insulation (top-up, stand-alone)	0.2	3
Loft insulation (top-up, with package)	0.8	9

Cavity Wall Insulation (CWI)

Cavity walls have been divided into two types based on the cost of insulating them to the required standard; 'easy-to-treat' (ETT) and 'hard-to-treat' (HTT). The exact split between ETT and HTT is unknown. However, some of the features of a wall that are likely to lead it to being more expensive to treat are easily identifiable through a standard Green Deal assessment.

The HTT cavities have therefore been divided in two groups; identifiable and unidentifiable. Identifiable HTT cavities have features that clearly separate them from other type of cavities, making it practical for ECO subsidies to be targeted at them. Estimates of the number of each type of cavity are based on research by Inbuilt and are summarised in the tables below.

Table 21 Technical potential for CWI by house type (thousands)

	Easy to treat	Hard to treat unidentifiable	Hard to treat identifiable	Total
Large detached house	296	44	442	782

	Easy to treat	Hard to treat unidentifiable	Hard to treat identifiable	Total
Small detached house	256	38	382	676
Large semi-detached or end-of-terrace	427	74	591	1,092
Small semi-detached or end-of-terrace	422	73	585	1,080
Large mid-terrace	244	22	118	384
Small mid-terrace	262	24	126	411
Large top-floor flat	137	9	97	243
Small top-floor flat	143	10	101	254
Large other flat	217	14	210	442
Small other flat	205	13	198	416
Total	2,608	321	2,850	5,779

Table 22 Categorisation of different types of hard to treat

Easy to treat	Hard to treat unidentifiable	Hard to treat identifiable	Untreatable
2.6m	Hard to treat – other (96,000) Properties with cavity walls in areas of high exposure (225,000)	Standard cavities requiring remedial work (1.4m) High rise – over 4 storeys (66,000) Narrow cavities (535,000) System build – concrete construction and metal frame (663,000) Random stone (175,000)	580,000

The estimated technical potential of hard-to-treat cavities is lower than in the consultation Impact Assessment, and the number of easy to treat cavities correspondingly higher. There are a number of reasons for this:

- It was previously assumed that 100% of non solid walled dwellings built between 1919 and 1939 had a narrow cavity. Inbuilt have reviewed this assumption through dialogue with industry stakeholders. They have reduced the total from 2.1 million to around 0.5 million.
- There is now more detailed information on wall types available on concrete frame construction. Previous data on concrete walls did not separate “no fines” construction (which should be classified as solid wall and not cavity wall). Concrete frame is now estimated as just over half a million when previously estimated as being over a million.
- The random stone estimate was previously based on estimations by local authorities. This has been revised using assumptions based on information from the British Geographic Survey which brought the estimated total down by approximately 230,000.
- The previous timber frame category has been refined and split into 4 separate categories all of which are now derived from the 2008 English Household Survey (EHS). They have been broken down into; metal construction (metal frame), timber frames with un-insulated studwork in dwellings with a masonry cavity, timber frames in buildings with no masonry cavity (this is not an empty cavity) and timber frames with insulated studwork in dwellings with a masonry cavity. The last category should have its masonry cavities left unfilled to maintain the integrity of the construction. This has created a new group of around 580,000 dwellings that have a cavity but are considered un-treatable.
- The original hardto-treat estimate did not include estimates of the number of standard empty cavities which are considered harder to fill due to: high rain and wind exposure, over

4 storeys high, or with faults in the outer wall which would need to be remediated before filling. These have now been grouped into a category entitled “standard cavities – some issues” in the Inbuilt report.

Solid Wall Insulation (SWI)

The remaining potential for solid wall insulation is based on the number of solid wall properties within the housing stock, adjusted for the existing level of insulation and the amount expected to be insulated by January 2013 under existing policies. Within this potential there is wide range of types of solid wall each of which will lead to a different level of energy saving if insulated. The updated analysis presented in this Impact Assessment captures some of this variation.

The 2009 EHS solid wall categories and age band splits have been mapped to the different categories and age bands used in Standard Assessment Procedure (SAP). These have then be grouped into three broad categories based on the pre-insulation thermal performance of the wall. These are set out below.

Table 23 Technical potential of SWI by house type (thousands)

	Type 1	Type 2	Type 3	Total
Description of type	System build	Pre-1966 9" solid brick	Other solid walls	
Large detached house	30	382	176	588
Small detached house	17	227	105	349
Large semi-detached or end-of-terrace	73	951	439	1463
Small semi-detached or end-of-terrace	40	527	243	810
Large mid-terrace	62	804	371	1237
Small mid-terrace	44	569	263	876
Large top-floor flat	21	265	122	408
Small top-floor flat	11	138	64	213
Large other flat	29	385	178	592
Small other flat	18	237	109	364
Total	345	4,485	2,070	6,900

Loft Insulation

The research suggests that CERT has successfully driven cost-effective delivery of loft insulation and consequently there are diminishing numbers of un-insulated lofts remaining. A modelling assumption has been made that from 2013 onwards loft insulation will be focussed on topping up existing insulation (with a thickness of less than 150mm) to recommended standards rather than installing insulation where none existed previously. The energy savings from a loft insulation top-up are considerably lower than from insulating untreated lofts.

Table 24 Technical potential of loft top-up by house type (thousands)

Description of type	Filled cavity	Unfilled cavity	Solid Wall	Total
Large detached house	332	201	182	715
Small detached house	366	172	108	646

Large semi-detached or end-of-terrace	537	394	453	1,385
Small semi-detached or end-of-terrace	544	337	251	1,132
Large mid-terrace	162	149	383	695
Small mid-terrace	177	151	271	600
Large top-floor flat	102	105	126	334
Small top-floor flat	80	96	66	242
Total	2,298	1,607	1,842	5,748

Table 25 shows how the estimates of LI potential are derived. The uptake of lofts in the model is driven more by the policy design than the stock of potential, so changes to these assumptions would have little effect on expected installations from Green Deal /ECO.

Table 25: Decomposition of LI potential estimates (m)

	Source:		
	Housing surveys (EHS, SHCS etc.)	DECC statistics including OfGEM, Warm Front etc.	DECC assumptions
Apr. '08 baseline	13.1		
Apr. '09 published data		12.4	
Dec. '11 published data		9.3	
Assumed CERT/CESP etc. delivery in 2012			1.9
Unfillable / hard to treat lofts			1.7
Remaining potential at end Dec 2012			5.7

Assumptions:

1. Lofts with 125mm of insulation or more are treated as insulated and outside this potential.
2. Source of unfillable loft estimates is a BRE report from 2008, based on 2002-2004 EHCS data showing 6.8% of housing stock had lofts that were hard to treat/unfillable. See http://www.bre.co.uk/filelibrary/pdf/rpts/Hard_to_Treat_Homes_Part_I.pdf

High Efficiency (Condensing) Gas Boilers

The number of condensing boilers in the housing stock has grown rapidly in recent years, as they are mandated by the Building Regulations for the replacement of domestic gas-fired and oil-fired boilers. DECC has estimated the remaining potential for the replacement of non-condensing gas boilers in 2013 by using data from the *Heating and Hot Water Industry Council* (HHIC). From 2005, when there were fewer than 2 million condensing boilers in the GB housing stock, there are projected to be approximately 11 million condensing boilers by 2013. This will leave about 12 million non-condensing gas boilers as the remaining technical potential for replacement. As 4% of GB homes have an oil-fired boiler, this means that the technical potential for improving the efficiency of oil-fired boilers is approximately 1 million.

Double Glazing

The EHS¹⁰² shows that 73% of English homes are fully double-glazed, 13% are at least half double-glazed, while 9% have no double glazing. This double glazing is predominantly PVC-U¹⁰³, which gives lower U-values than most metal or wooden frames. Building Regulations have generally required replacement glazing to be of at least E-rating since 2002, and C-rating since 2010.

The theoretical technical potential for double-glazing would be that all GB homes have A-rated double glazing. However, a feasible potential in the Green Deal period would be for households to take account of the need to replace windows due to house refurbishment, and to the need to replace double-glazed units as seals fail and the units mist up internally and their capacity for saving energy declines.

Floor Insulation

There is little potential for floor insulation in cavity walled properties. For solid wall properties, it is estimated that there are 3,010,000 properties in England which could be suitable for floor insulation. This is estimated on the basis that there are 6,900,000 solid wall properties in England, of which 48.5% have suspended timber floors and it is assumed that 90% of these floors can be insulated.

Installing floor insulation is disruptive for most homes, requiring lifting of carpets and floorboards before installing insulation, replacing floorboards, and making good. This means that the willingness of households to go through this for a relatively small gain will be important, so, as with double-glazing, the theoretical technical potential is likely to be far greater than the feasible potential.

Technical Potential in the Carbon Saving Communities Eligible Group

There is a degree of uncertainty in relation to the technical potential to deliver measures in the 15% of areas of Great Britain that are most deprived according to the Index of Multiple Deprivation (the CSC eligible group). This is due to small data sample issues when examining individual local areas in national housing surveys. The approach taken here has been to identify the regions the 15% most deprived areas are within, identify the amount of technical potential within each region, and assign a share of that potential to each deprived area based on the share of each region's population that

¹⁰² <http://www.communities.gov.uk/publications/corporate/statistics/ehs200910headlinereport>

¹⁰³ English Housing Survey, housing stock report 2008

<http://www.communities.gov.uk/documents/statistics/pdf/1750754.pdf>

lives in that deprived area. The potential has been corrected for the estimated impact of previous energy efficiency schemes such as CERT. The estimated potential is detailed in the table below.

Estimated technical potential in the Carbon Saving Communities Obligation eligible group

Measure	Potential (m)
'Easy-to-treat' Cavity Wall Insulation	0.36
'Hard-to-treat' Cavity Wall Insulation	0.37
Solid Wall Insulation	1.00
Loft Top-Up	0.66

Supply Chain Constraints

The Energy Company Obligation (ECO) is expected to drive a substantial increase in the uptake of SWI. Over the medium to long term, supply side constraints are unlikely to affect uptake. The nature of the insulation supply chain means that in the medium term the market will respond to higher demand and increase output. However, there may be constraints on the rate at which SWI can be delivered in the short term, primarily due to the rate at which qualified installers can be trained. Following discussion with industry on the rate at which the supply chain will be able to increase output, the supply chain constraints assumptions set out in Table 26 have been included in the analysis. These assumptions are based on training being delivered by an industry “fast track” approach. The uptake of SWI in the central scenario is lower than these supply constraints, suggesting they will not affect delivery.

Table 26 Maximum annual take up of SWI due to supply constraints

Year	Range provided by industry	Assumption used
2013	75,000 - 110,000	80,000
2014	105,000 - 155,000	150,000
2015	190,000 - 229,000	200,000

The current levels of delivery of cavity wall and loft insulation indicate that supply constraints will not affect the uptake of these measures under the Green Deal.

Measure Costs

Installation Costs

Cost assumptions for the main domestic sector energy-efficiency measures included in the analysis are based on the Supply Chain Review¹⁰⁴ (2009) and have been evaluated in DECC's *Review of costs and benefits of energy efficiency measures*¹⁰⁵. This call for evidence asked stakeholders to submit evidence about the direct and additional costs of installation and the performance of energy efficiency measures. Around 300 responses were received and were analysed by Energy Efficiency Partnership for Homes (EEPH). The results of this analysis have been incorporated into the GDHM.

¹⁰⁴ *Solid Wall Insulation Supply Chain Review*, Purple Market Research, May 2009

¹⁰⁵ Undertaken by the Energy Efficiency Partnership for Homes (EEPH) and Purple Market Research (May 2011), responses were requested between 14 March and 4th April 2011.

For SWI, a simple linear relationship based on the EEPH call for evidence was used to determine the relationship between the size of property and likely installation costs. The costs are determined as follows:

$$\text{Cost of internal SWI} = £42.5 \times \text{external wall area (m}^2\text{)} + £1900$$

$$\text{Cost of external SWI} = £57.7 \times \text{external wall area (m}^2\text{)} + £5330$$

The cost of installing these measures in a typical 3 bedroom semi-detached house (with external wall area of 80m²) is therefore £9,950 for external and £5,300 for internal SWI. Table 27 shows the cost assumptions used for internal and external SWI for different house types and Table 28 shows the cost assumptions for the other measures included in the analysis.

Table 27 SWI installation costs assumptions by property size

House type	External wall area (m ²)	Internal SWI cost (£)	External SWI cost (£)
Large detached house	147	8,147	13,800
Small detached house	86.03	5,556	10,300
Large semi-detached or end-of-terrace	91.9	5,806	10,650
Small semi-detached or end-of-terrace	65.61	4,688	9,100
Large mid-terrace	70.73	4,906	9,400
Small mid-terrace	45.6	3,838	7,950
Large top-floor flat	77.31	5,186	9,800
Small top-floor flat	47.97	3,939	8,100
Large other flat	61.41	4,510	8,850
Small other flat	45.42	3,830	7,950

Table 28 Installation cost assumptions for domestic energy efficiency measures

Measure	Cost (£)
CWI – easy to treat	500
CWI – hard	1,875
Loft Insulation (professional) (150 to 250 mm)	300
Condensing gas boiler (G to A)	2,500
Floor insulation	400
Double glazing	4,500
Flue gas heat recovery	400
Draft proofing	100

Additional/Hidden Costs

Additional costs, sometimes known as hidden or hassle costs, are based on estimates of householder time spent researching, arranging, preparing for installation and returning their home to its previous condition. They also cover costs in addition to the installation cost that may be required when work is carried out independently of other major refurbishment or redecoration. Table 29 below sets out the assumptions that have been used. The assumptions about householder time and hassle costs are

based on Ecofys (2009), and assumptions about additional costs of installation have been drawn from EEPH (2011)¹⁰⁶¹⁰⁷. These costs gradually rise as the value of household time rises.

Table 29 Additional costs assumptions for domestic energy efficiency measures in 2013

	Additional costs to households (£)
Internal SWI	4,937
External SWI	178
CWI	78
Loft top up	103
Condensing gas boiler (G to A)	97
Floor insulation	315
Double glazing	28
Draft proofing	19

Economies of Scale & Learning Rates

Economies of Scale

It is anticipated that economies of scale will reduce the per-house installation cost of external solid wall insulation in the social housing sector by treating entire blocks of flats / housing complexes in one go. This effect is incorporated by applying cost reduction factors to the per-house installation cost of external solid wall insulation in the social housing sector. Industry research has suggested that cost reductions of up to 30% can be delivered by treating multiple properties (this has been increased to 40% for flats to account for the greater economies of scale available). A sensitivity scenario is included in which action by local authorities and communities to co-ordinate delivery allows further economies of scale to be realised in the owner occupied and private rented sectors. These use a more conservative assumption of 20% cost reduction for measures delivered under the Carbon Saving Community target and a 10% cost reduction for measures delivered under the Carbon Saving Obligation.

Learning Rates

Reductions in costs are expected to have been fully exploited in mature markets (eg. boilers and CWI). However, within the SWI industry there is considerable potential for reductions in installation costs. The external SWI market is currently dominated by labour intensive processes, but the use of pre-cut panels with a dry external finish could reduce the cost of labour and require less scaffolding, which acts as a major driver of onsite costs. Other innovations that could reduce costs include developing SWI systems that are easier to fit, thereby reducing labour costs, and new survey methods such as 3-D imaging using lasers. The cost of CWI fell by 50% between 1995 and 2005. Discussions with industry have suggested that SWI cost could fall by between 10% and 25% as output is increased. This Impact Assessment uses a central estimate of 15% with sensitivities of 10% and 20%.

¹⁰⁶ Ecofys (2009), "The hidden costs and benefits of domestic energy efficiency and carbon saving measures", http://www.decc.gov.uk%2Fassets%2Fdecc%2Fwhat%2520we%2520do%2Fsupporting%2520consumers%2Fsaving_energy%2Fanalysis%2F1_20100111103046_e_%40%40_ecofyshiddencostandbenefitsdefrafinaldec2009.pdf

¹⁰⁷ EEPH (2011) "Review of costs & benefits of energy efficiency measures", forthcoming.

Energy Savings

The energy savings from insulation measures have previously been assessed using controlled field trials, typically with small samples. The establishment of the National Energy Efficiency Data-framework (NEED)¹⁰⁸ gives analysts access to individual households' energy use data. This has enabled provision of a wider and more robust understanding of energy use and energy efficiency. This dataset has been analysed for this assessment and has revealed that previous field trials overstate observed savings from energy efficiency measures.

DECC scientists have used NEED to provide estimates of underachievement in real-world energy savings from the measures relative to SAP predicted savings. These factors have been estimated through a comparison of NEED 'actuals' with SAP performance predictions for CWI. Relative to SAP predicted savings, performance estimates from NEED indicate that CWI only delivers 50% of these savings. It is assumed that three factors contribute towards this 50% reduction: physical underperformance or systematic difference between buildings physics models and in use savings achieved; a proportion of the building stock walls that are inaccessible; and a degree of comfort taking (also known as the rebound effect).

Based on a review of measured versus theoretical energy savings for CWI¹⁰⁹, a 35% 'In use' factor is applied to the original SAP estimate. In addition, it is estimated that approximately 10% of the building stock's external walls are inaccessible, reducing performance of CWI installations. Once these two factors are accounted for, the residual of approximately 15% additional underperformance is assumed to be due to comfort-taking.

At present similar data on SWI does not exist, but it is assumed that the inaccessibility and comfort factors above will be similar in magnitude and that an 'In use' factor should also be applied. DECC convened a task group of experts from industry and academia to review the available evidence and to make a recommendation on what in-use factors should be used at the launch of the Green Deal. The group recommended an in-use factor of 25% be applied to the savings from SWI. In addition, there is some evidence from field trials that the thermal performance of some solid walls before insulation is better than assumed in the SAP methodology. An additional 8% reduction in energy savings has been applied for SWI installed in this type of property to account for this. Research into the energy savings delivered by SWI is ongoing.

These adjustments to the energy savings estimate from SAP are outlined in the first table below for a representative property (a 3 bed semi detached house). The average energy saving before comfort taking for the different sized properties used in the analysis are outlined in the second table.

¹⁰⁸ NATIONAL ENERGY EFFICIENCY DATA-FRAMEWORK Report on the development of the data-framework and initial analysis. DECC, June 2011.

¹⁰⁹ Glasgow Caledonian University – *Review of differences between measured and theoretical energy savings for insulation measures* – (2006)
http://www.decc.gov.uk/assets/decc/what%20we%20do/supporting%20consumers/saving_energy/analysis/insulationmeasures-review.pdf

Table 30 Energy savings from different measures for a 3 bed semi detached house

Measure	Savings SAP (kWh)	Inaccessibility factor	In use factor	Energy saving before comfort taking (kWh)	Bill saving before comfort taking (£) ¹¹⁰	Comfort factor	Energy saving after comfort taking (kWh)
SWI: Type 1	9,111	10%	25%	6150	£306	15%	5,227
SWI: Type 2	9,111		25% + 8%	5,494	£274		4,670
SWI: Type 3	5,614		25%	3,789	£190		3,221
CWI	4,569		35%	2,673	£134		2,272
Loft top up	845 ¹¹¹	41%		499	£25		424

Table 31 Energy savings before comfort taking from the main insulation measures for different property sizes and wall types (kWh)

	Large detached house	Small detached house	Large semi-detached	Small semi-detached	Large mid-terrace	Small mid-terrace	Large top-floor flat	Small top-floor flat	Large other flat	Small other flat
Solid wall type 1										
SWI internal	12,078	6,119	7,315	5,001	5,204	3,134	5,736	3,594	4,300	2,934
SWI external	12,032	6,094	7,291	4,983	5,187	3,121	5,716	3,570	4,286	2,925
Solid wall type 2										
SWI internal	10,752	5,448	6,512	4,452	4,633	2,790	5,107	3,200	3,828	2,612
SWI external	10,712	5,425	6,491	4,436	4,618	2,778	5,089	3,178	3,815	2,604
Solid wall type 3										
SWI internal	7,438	3,769	4,505	3,080	3,205	1,930	3,533	2,214	2,648	1,807
SWI external	7,410	3,753	4,490	3,069	3,195	1,922	3,520	2,199	2,639	1,801
Loft and cavity insulation										
CWI	4,260	2,468	3,290	2,115	2,605	1,538	2,272	1,855	1,858	1,131
Loft top up	1,122	850	680	533	590	456	853	463	-	-

Adjustment for Under-Heating

There is evidence that low income and vulnerable households under-heat their houses by approximately one degree compared with households in the non-priority group (in addition to any under heating relative to SAP assumptions)¹¹². To reflect the fact that under-heating by these households means they will not achieve the same savings, the energy savings for priority group households are reduced by 10% when calculating net bill savings. This reduction impacts on the Utility function (see Annex B) affecting customer preference and therefore the probability of uptake.

¹¹⁰ In 2013 for a household with gas central heating (5.0 p/kWh)

¹¹¹ An illustrative top up from 100mm of loft insulation to 250mm is used

¹¹² This is to reflect the fact that under-heating by low income and vulnerable households means they will not achieve the same savings. The 2008 Warm Front evaluation (Green and Gilbertson, 2008) shows that before receiving heating and insulation measures, Warm Front eligible households (an imperfect but solid proxy for Affordable Warmth eligible households) typically heated their living rooms across a relatively low distribution of temperatures, averaging 17.9°C.

Green Deal Mechanism Assumptions

Assessment costs

A total assessment cost of £112.50 has been estimated based on the following assumptions: It is estimated that the cost of the fabric component of domestic assessments will be £75, the same as for an Energy Performance Certificate (EPC). Occupancy assessments are assumed to require between one and two hours, costed at £25/hour, with a central estimate of £37.50.^[2]

We expect there to be a range of business models in the market. Some may require customers to pay some of the assessment costs upfront, while others may provide free assessments and pass on the cost of unsuccessful assessment to their Green Deal customers. In other cases unsuccessful assessment cost will be lower than assumed (e.g. in delivery by social housing associations). Our central estimate of demand for the Green Deal uses the assumption that 1 in 3 assessments will result in a Green Deal, and that of the 2 unsuccessful assessments the cost of 1 will be recovered from the each Green Deal. The cost of the other is assumed to be covered by the following:

- consumers will pay a small amount upfront for assessments in some cases;
- unsuccessful assessments will not cost as much as successful assessments in some cases (due to the assessor determining that the customers is not eligible or interested before the full assessment has been done);
- the unsuccessful assessment cost will be lower in the social housing sector; and
- a certain level of fixed cost for survey's are already included in the EEPH installation costs measure

Green Deal provider costs

The Green Deal provider incurs costs in coordinating and administering the advice and sales process. The model splits these costs into one-off and recurring costs. It is assumed that once a householder has decided in favour of taking up a Green Deal after the assessment has been concluded, then the provider will spend one hour in advising and arranging the administrative details of a particular plan. The model assumes the hourly cost of labour at the rate equivalent to that of a financial adviser at £16. The hourly rate is based on the government's Standard Cost Methodology used to estimate cost of working time.

The Green Deal provider also incurs costs in respect of overheads and of compliance with mandated responsibilities. Whereas the Standard Cost Methodology usually costs overheads at 30% of a one-off labour cost, the model assumes a more conservative rate of 50% to reflect a range of mandated responsibilities. These costs are subsumed within the recurring overhead rate of £8 per Green Deal plan. The full range of mandated responsibilities is itemised in the Chapter 8 "Green Deal Mechanism Costs" of the Impact Assessment.

Table 32 Green Deal Mechanism Costs used in the modelling

	Cost
The Green Deal set up costs (£)	16
The ongoing Green Deal management costs (£ pa)	8

^[2] Rate for the equivalent skill set of a Quantity Surveyor, based on the Standard Cost Model.

Green Deal Interest Rates

This Impact Assessment makes the following assumptions for Green Deal interest rates in the domestic sector. Further analysis on this can be found in Annex I.

Table 33 Green Deal Interest rates used in the modelling

Low	6.50%
Central	7.50%
High	9.50%

Green Deal Repayment terms

The central run presumes that the Green Deal repayment is allowed to rise 2% per year throughout the repayment period. Further analysis of the effect of this can be found in Annex G.

Green Deal Repayment periods

The choice of repayment period is important because it affects the annual Green Deal charge and hence the net bill savings consumers receive. For example, a £1000 measure would require an annual Green Deal charge of £146 if paid back in flat instalments over ten years, assuming a 7.5% interest rate. But if paid back over twenty years, the charge would be just £98 pounds. So if the measure is expected to save £150 annually, the customer could expect bill savings of £4 a year if paying back over ten years and £52 if paying back over twenty. This trade-off between higher bill saving (good) and longer repayment period (bad) is reflected in the consumer preference section of the model where uptake is affected positively by the first component and negatively by the second.

As such, we have selected standard repayment periods for each measure to best reflect their cost and performance, so as to achieve a certain level of net bill savings while keeping repayment periods to a reasonable length. Hence all solid wall insulation packages are repaid over twenty years and all cavity wall insulation packages are paid back over ten years. In reality, customers will be free to choose their own preferred repayment period, within Golden Rule constraints, so in this respect the modelling is conservative.

Table 34 Repayment term assumptions used in the modelling

Measure	Repayment term
SWI (internal and external)	20 years
CWI, Loft top-up	10 years

Energy Price Assumptions

Table 35 Energy price assumptions - variable price element

Domestic Sector			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Electricity	p/kWh (2011)	High	8.4	9.4	10.0	9.8	9.6	9.6	10.0	10.1	10.5	10.7	11.0	11.2	11.4	11.9	12.2
		Central	8.4	8.8	9.3	9.2	9.2	9.2	9.3	9.0	9.0	9.3	9.7	9.9	10.0	10.6	10.9
		Low	7.7	6.7	6.5	6.7	6.6	6.3	6.5	6.4	6.7	7.2	7.6	7.9	7.7	8.4	8.8
Gas	p/kWh (2011)	High	2.3	2.8	2.9	3.0	3.1	3.1	3.2	3.3	3.4	3.4	3.5	3.6	3.6	3.6	3.6
		Central	2.3	2.5	2.7	2.9	2.9	2.9	2.8	2.6	2.6	2.6	2.6	2.6	2.6	2.6	2.6
		Low	2.3	1.8	1.2	1.3	1.3	1.3	1.3	1.3	1.4	1.4	1.5	1.5	1.5	1.6	1.6
Burning Oil	p/litre (2011)	High	53.7	54.6	55.9	57.3	58.4	59.5	60.7	61.9	63.2	64.4	65.7	67.0	68.4	69.8	71.2
		Central	53.7	54.0	54.6	55.2	55.6	56.1	56.5	56.9	57.3	57.8	58.2	58.6	59.1	59.5	60.0
		Low	53.7	52.6	52.0	51.4	50.5	49.7	48.9	48.1	47.3	46.5	45.7	45.0	44.3	43.6	42.9

Non-domestic sector			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Electricity	p/kWh (2011)	High	8.4	9.4	10.0	9.8	9.6	9.6	10.0	10.1	10.5	10.7	11.0	11.2	11.4	11.9	12.2
		Central	8.4	8.8	9.3	9.2	9.2	9.2	9.3	9.0	9.0	9.3	9.7	9.9	10.0	10.6	10.9
		Low	7.7	6.7	6.5	6.7	6.6	6.3	6.5	6.4	6.7	7.2	7.6	7.9	7.7	8.4	8.8
Gas	p/kWh (2011)	High	2.3	2.8	2.9	3.0	3.1	3.1	3.2	3.3	3.4	3.4	3.5	3.6	3.6	3.6	3.6
		Central	2.3	2.5	2.7	2.9	2.9	2.9	2.8	2.6	2.6	2.6	2.6	2.6	2.6	2.6	2.6
		Low	2.3	1.8	1.2	1.3	1.3	1.3	1.3	1.3	1.4	1.4	1.5	1.5	1.5	1.6	1.6

Table 36 Energy price assumptions - retail prices

Domestic Sector			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Electricity	p/KWh (2011)	High	14.8	16.5	17.3	17.8	17.8	18.3	19.1	19.1	20.1	20.7	21.2	21.5	21.5	22.0	22.5
		Central	14.8	15.9	16.7	17.2	17.4	18.0	18.3	18.0	18.6	19.3	19.9	20.2	20.2	20.7	21.2
		Low	14.1	13.5	13.2	13.9	13.8	13.9	14.4	14.1	14.8	15.5	15.9	16.5	16.2	17.0	17.5
Gas	p/KWh (2011)	High	4.4	5.2	5.3	5.5	5.7	5.9	6.0	6.1	6.2	6.4	6.5	6.6	6.7	6.7	6.7
		Central	4.4	4.8	5.0	5.4	5.5	5.6	5.4	5.1	5.2	5.2	5.3	5.3	5.3	5.3	5.3
		Low	4.4	3.8	3.0	3.2	3.3	3.4	3.5	3.5	3.6	3.7	3.7	3.8	3.9	3.9	4.0
Burning Oil	p/litre (2011)	High	62.7	63.9	65.1	66.4	67.7	69.1	70.4	71.8	73.3	74.7	76.2	77.8	79.3	80.9	82.6
		Central	62.7	63.1	63.6	64.1	64.6	65.0	65.5	66.0	66.5	67.0	67.5	68.0	68.5	69.0	69.6
		Low	62.7	61.6	60.6	59.6	58.6	57.6	56.7	55.7	54.8	53.9	53.1	52.2	51.3	50.5	49.7
Non-domestic sector			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Electricity	p/KWh (2011)	High	12.5	13.7	14.6	14.7	14.4	14.6	15.2	15.4	16.1	16.6	17.1	17.3	17.4	18.0	18.3
		Central	12.4	13.1	14.0	14.1	14.1	14.3	14.5	14.4	14.7	15.2	15.8	16.1	16.2	16.7	17.1
		Low	11.8	11.1	11.1	11.4	11.1	11.0	11.2	11.1	11.5	12.1	12.3	12.7	12.5	13.3	13.7
Gas	p/KWh (2011)	High	3.3	3.9	4.0	4.1	4.2	4.3	4.4	4.5	4.6	4.7	4.8	5.0	5.0	5.0	5.0
		Central	3.3	3.5	3.7	4.0	4.1	4.1	3.9	3.7	3.7	3.8	3.8	3.8	3.8	3.9	3.9
		Low	3.3	2.7	2.1	2.2	2.2	2.2	2.3	2.3	2.4	2.5	2.5	2.6	2.6	2.7	2.8

Energy Emissions Assumptions

Table 37 Energy emissions assumptions - variable and retail elements

Domestic Sector		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
kgCO ₂ /kWh	Gas	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18	0.18
	Oil	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25
	Solid	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30
	Electricity	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37	0.37
		0.45	0.46	0.44	0.44	0.41	0.36	0.35	0.30	0.29	0.30	0.28	0.26	0.25	0.24	0.23

Air Quality Damage Cost Assumptions

Table 38 Air Quality damage assumptions

Domestic		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
(p/kWh)	Gas	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.05	0.05	0.05
	Oil	0.74	0.74	0.74	0.74	0.74	0.74	0.85	0.85	0.85	0.85	0.87	0.88	0.90	0.92	0.94
	Solid	4.98	5.09	5.20	5.30	5.41	5.51	5.62	5.73	5.83	5.94	6.06	6.18	6.30	6.43	6.56
	Electricity	0.13	0.13	0.13	0.13	0.14	0.14	0.14	0.15	0.15	0.15	0.15	0.16	0.16	0.16	0.17

Carbon prices

Valuations of the savings pertaining to avoided carbon emissions are made according to projected EU Emissions Trading Scheme Allowance (EUA) prices, and modelled shadow prices of carbon. These are in line with Interdepartmental Analysts' Group accepted projections¹¹³.

Table 39 EUA price assumptions and shadow price of carbon assumptions

			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Traded carbon value	£/tCO ₂ (2011)	High	17.4	18.5	20.0	21.3	23.5	26.5	27.8	30.8	32.7	35.5	43.1	50.6	58.2	65.8	73.4
		Central	13.5	14.5	15.9	17.1	18.9	20.5	21.9	23.5	25.7	28.5	33.1	37.7	42.2	46.8	51.4
		Low	6.4	7.2	8.8	10.0	11.5	13.8	15.1	15.9	17.2	19.1	20.9	22.7	24.5	26.3	28.1
Non-traded carbon value	£/tCO ₂ (2011)	High	83.5	84.7	86.0	87.3	88.6	89.9	91.3	92.6	94.0	95.4	97.0	98.6	100.2	101.8	103.4
		Central	55.6	56.5	57.3	58.2	59.1	59.9	60.8	61.7	62.7	63.6	64.7	65.7	66.8	67.9	68.9
		Low	27.8	28.2	28.7	29.1	29.5	30.0	30.4	30.9	31.3	31.8	32.3	32.9	33.4	33.9	34.5

Non-Domestic Sector Model Inputs

Measures

Details on measures are taken from the Non-Domestic Buildings Energy and Emissions Model (N-DEEM), produced by BRE, including costs, abatement potentials and lifetimes. Assumed take-up rates are taken from Element Energy's analysis¹¹⁴ and are adjusted according to projected policy savings¹¹⁵ as described in the main body of this document. Assumptions relating to these measures are presented in the table below.

¹¹³ Available at http://www.decc.gov.uk/en/content/cms/about/ec_social_res/iag_guidance/iag_guidance.aspx

¹¹⁴ *Uptake of energy efficiency in buildings*. Element Energy (2009) [http://downloads.theccc.org.uk/docs/Element%20Energy final efficiency buildings.pdf](http://downloads.theccc.org.uk/docs/Element%20Energy%20final%20efficiency%20buildings.pdf)

¹¹⁵ DECC Energy Model projections

Table 40 Eligible Green Deal measures in the non-domestic sector

			Energy savings potential in 2010 (GWh pa)					
Measure	Lifetime of measure (Years)	Total capital costs (2010)	Electricity	Gas	Coal	Oil	Total	BAU take-up to 2020 (% of 2010 potential)
Programmable Thermostats	10	44	2,728	15,318	0	2,005	20,051	46%
Basic Lighting Timer	10	6	6,187	0	0	0	6,187	32%
Light Detectors	10	10	652	0	0	0	652	32%
Sunrise-Sunset Lighting Timers	10	0	657	0	0	0	657	32%
Presence detector	10	478	1,802	0	0	0	1,802	33%
Stairwell timer	10	46	1,144	0	0	0	1,144	29%
Compressed Air - Reduced Inlet Temp	5	1	16	0	0	0	16	76%
Heating - More efficient air conditioning	10	0	1,975	40	0	0	2,015	99%
4 Pole Motor - EFF1 replace 4 Pole	3	1	10	0	0	0	10	67%
Variable Speed Drives medium	3	0	3	0	0	0	3	66%
Variable Speed Drives small	3	1	8	0	0	0	8	66%
Windows - Double Glazing Air Filled	20	21	8	24	0	3	36	69%
Windows - Double Glazing Argon Filled	20	17	5	19	0	3	27	69%
Windows - Low E Double Glazing - Air Filled	20	25	9	27	0	4	40	69%
Windows - Low E Double Glazing - Argon Filled	20	23	7	26	0	4	36	69%
Windows - Ultra-Low E Double Glazing - Air Filled	20	27	10	29	0	4	43	69%
Windows - Ultra-Low E Double Glazing - Argon Filled	20	20	7	22	0	3	32	69%
Insulation - Roof - Flat 100 mm	20	582	270	1,463	0	193	1,925	19%
Insulation - Roof - Flat 150 mm	20	671	272	1,186	0	162	1,620	19%
Insulation - Roof - Flat 200 mm	20	283	240	422	0	74	736	19%
Insulation - Roof - Flat 80mm	20	566	266	1,445	0	190	1,902	19%
Insulation - Roof - Pitched 100mm	20	570	480	992	0	164	1,635	20%

			Energy savings potential in 2010 (GWh pa)					
Measure	Lifetime of measure (Years)	Total capital costs (2010)	Electricity	Gas	Coal	Oil	Total	BAU take-up to 2020 (% of 2010 potential)
Insulation - Roof - Pitched 150mm	20	157	327	84	0	46	457	20%
Insulation - Roof - Pitched 200mm	20	198	320	86	0	45	451	20%
Insulation - Roof - Pitched 80mm	20	549	473	968	0	160	1,602	20%
Insulation -Wall - External Cladding 50mm	20	19	6	20	0	3	29	37%
Insulation -Wall - Masonary Cavity 100mm	20	76	179	60	0	27	265	30%
Insulation -Wall - Masonary Cavity 65mm	20	108	217	137	0	35	389	30%
Insulation -Wall - Masonary Cavity 75mm	20	54	176	59	0	26	262	30%
Lights - 16 mm Fluorescent Tubes Replace 26mm	3	95	643	0	0	0	643	53%
Lights - Compact Fluorescent Lamps without ECG & Tungsten	3	110	2,521	0	0	0	2,521	72%
Lights - ECG Compact Fluorescent Lamps & Tungsten	3	282	2,558	0	0	0	2,558	72%
Lights - HF Ballast	3	94	664	0	0	0	664	70%
Lights - IRC Tungsten-Halogen - Spots	3	25	344	0	0	0	344	74%
Lights - LEDs Replace 26mm Fluorescent Tubes	3	118	887	0	0	0	887	53%
Lights - Metal Halide Floods	3	7	90	0	0	0	90	68%
Heating - TRVs Fully Installed	10	22	0	5,713	0	3,858	9,571	54%

Non-Domestic Sector Costs

The assumed assessment costs are given by qualitative size of building. The costs assumed in this assessment are listed in the table below.

Table 41 Non-domestic buildings' assessment costs

Small	Medium	Large
£250	£500	£1,000

There are assumed to be other costs above the assessment costs, in particular hidden costs. Hidden costs are taken as equivalent to a 20% mark-up on capital. This is based on findings from a literature review¹¹⁶, and takes the mean of the estimates for generic transaction costs.

The buildings that fall under each of these categories is illustrated in the table below, taken from Carbon Trust/AEA work on Green Deal scenarios of hypothetical non-domestic buildings.

¹¹⁶ *Review and development of carbon dioxide abatement curves for available technologies as part of the Energy Efficiency Innovation Review* (Enviros, 2006)
http://www.decc.gov.uk/assets/decc/what%20we%20do/supporting%20consumers/saving_energy/analysis/enviros-report.pdf (p43)

Table 42 Non-domestic buildings illustrative categorisation

Size category	Illustrative buildings
Small (37%)	Small office Surgery (small building) Hotels and catering - Pub Hotels and catering - B&B small food shop small industrial unit (light manufacturing)
Medium (29%)	Medium office, single occupancy Medium office, multiple occupancy 1 floor on large building. School in one medium sized building Medium multiple building school Hotels and catering - Hotel in listed building Medium size store in outlet centre Medium department store Medium sized leisure centre with swimming pool Heated warehouse - medium size. No cooling Medium industrial unit
Large (19%)	Large office including data centre Hospital (large building) Air conditioned prestige hotel Large supermarket
Unknown (15%)	Other Communication and transport Government Agriculture

Affordable Warmth Model Assumptions

Input assumptions for the Affordable Warmth model are consistent with those for the Green Deal Household Model in relation to insulation measures, energy prices, carbon values and air quality damage factors. The primary differences relate to the treatment of heating measures, the approach to which is summarised in section 0. The estimated maximum technical potential for installing major measures that would score against the Affordable Warmth target

in the eligible group is shown in Table 43. The potential is adjusted for the anticipated installation of measures to Affordable Warmth eligible households under schemes such as CERT and Warm Front leading up to the launch of Green Deal and ECO. It is important to note that in modelling uptake of measures in the Affordable Warmth eligible group those measures installed under the Green Deal are removed from this technical potential first (reflecting the likelihood that measures are unlikely to be subsidised if households are willing to take out Green Deal packages unassisted), and a further downward adjustment is made to reflect uncertainty around likelihood of household take up. See Annex D for more details.

Table 43 Technical potential for Affordable Warmth eligible measures in 2013

Measure	Technical Potential in 2013 (million)
Cavity Wall Insulation (Easy To Treat)	0.24
Cavity Wall Insulation (Hard To Treat)	0.13
Loft Top Up Insulation (150mm to 250mm)	1.00
Solid Wall Insulation	0.83
Install New Central Heating (where none previously existed)	0.13
Replace Broken Boilers*	0.16 per year

* Boiler replacement opportunities are a flow, whereby more opportunities become available each year¹¹⁷

Heating Counterfactual and Under-heating

The below table sets out the assumptions underpinning the counterfactual for the installation of heating systems under the Affordable Warmth target.

¹¹⁷ Source: EHS, SHCS, LIWS (adjusted for CERT and Warm Front installations up to Green Deal and ECO launch)

Table 44 Assumptions underpinning changes in energy use resulting from installation of Affordable Warmth Heating Measures

Heating Measure	Before Installation of AW Heating Measures	After Installation of AW Heating Measures
New Electric Central Heating	Non-central, non-storage electric heating	Electric central storage heaters
New Gas Central Heating	Non-central, non-storage electric heating for 60% of households and 40% of households with gas non-central heating or gas room heating ¹¹⁸ .	Full gas central heating system
New Oil Central Heating	Non-central, non-storage electric heating for 60% of households and 40% of households with oil non-central heating or gas room heating.	Full oil central heating system
Oil Replacement Boiler	Non-central, non-storage electric heating for 60% of households and oil non central heating for 40%.	Boiler is replaced by A/B – rated boiler in base year
Gas Replacement Boiler	Non-central, non-storage electric heating for 60% of households and 40% of households with gas non-central heating or gas room heating or intermittent use of a gas boiler.	Boiler is replaced by A/B – rated boiler in base year
LPG Replacement Boiler	Non-central, non-storage electric heating.	Boiler is replaced by A/B – rated boiler in base year

The other primary difference is that for households eligible for Affordable Warmth measures, a level of under-heating is assumed – it is assumed that all households heat to 18°C before an installation and 19°C after an installation.¹¹⁹ The energy changes relating to the repair or installation of a new heating system will be dependent on other characteristics of the dwelling, in particular the level of insulation present. The level of insulation is assumed to be the average for cavity wall homes (around 70%) and no insulation for solid wall homes (around 30%) prior to heating repairs. After heating measures are installed it is assumed that if a household's cavity wall was not filled pre-intervention, it would be filled at the same time as the heating system is installed.

¹¹⁸ This is based on data from previous Government schemes which shows that when a heating system was not fully functional pre-installation, around 60% of households used non-central electric heating, and around 40% used non-central gas heating/an intermittent gas boiler.

¹¹⁹ Based on evidence from the Warm Front Study Group Evaluation for the average internal temperature pre and post intervention; Available at:

<http://www.apfo.org.uk/resource/item.aspx?RID=53281>

Annex B: The Green Deal Household Model

Overview

The impact on the domestic sector of the Green Deal and the Energy Company Obligation (ECO) Carbon targets has been modelled using the Green Deal Household Model (GDHM). This model simulates the uptake of energy efficiency measures amongst British households based on the characteristics of households, insulation measures and other economic factors. Different sensitivity scenarios have been modelled to represent different possible trajectories for Green Deal take-up.

This annex describes how the GDHM works. The first section discusses the technical inputs to the GDHM. This includes the characterisation of the housing stock and a discussion of the remaining opportunities for major building fabric energy efficiency improvements. The second section describes how the model estimates uptake of those opportunities. This includes a description of the model of consumer choices and the parameters underlying the demand scenarios that have been used to illustrate the range of potential impacts of the Green Deal and ECO. The third section describes the approach taken to modelling the behaviour of energy companies as they subsidise energy efficiency measures in order to meet the carbon target at least cost. Further details of the classification of the housing stock, the SAP calculations used to estimate energy saving and the analysis of the Green Deal consumer survey responses can be found in the Green Deal Household Model Assumptions Document published alongside the Consultation Impact Assessment.¹²⁰

Homes and measures

Classification of the Housing Stock

In order to represent the varied nature of the housing stock's current physical and energy efficiency characteristics, the GDHM uses data from the English House Condition Survey 2007/08, the Scottish House Condition Survey 2007/09, and the Living in Wales Survey to segment the housing stock into the following groups:

- 5 dwelling types split by large and small size;
- 5 fuel and 16 heating system types;
- 3 high-level external wall types (filled cavity walls, unfilled cavity, solid walls); within which...
 - 3 types of unfilled cavity walls (easy to treat, identifiable hard to treat, unidentifiable hard to treat)
 - 3 bands of solid wall performance potential;
- 3 levels of loft insulation
- 3 tenures (social housing, private rented and owner occupied); and
- 2 socio-economic groups (based on the eligibility criteria for Affordable Warmth support)

This segmentation results in 3,866 house types for Great Britain.

For the purposes of identifying the low income and vulnerable groups (based on the CERT super priority group), survey responses regarding the receipt of benefits are used. Survey responses have

¹²⁰ http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

been found to understate the number of benefit claimants found in administrative sources¹²¹. To account for this the survey-derived housing stock lived in by low income and vulnerable groups has been scaled up to match the estimate derived from administrative data¹²².

Major Building Fabric Measures

Three major insulation measures are considered:

- Solid Wall Insulation (SWI) (applying insulation to the exterior or interior of a wall without cavity);
- Cavity Wall Insulation (CWI) (applying insulation to a wall cavity, or in some extreme hard to treat cases, the exterior or interior of the wall); and
- Loft-top-up Insulation (LI) (increasing the depth of loft insulation to 270mm).

The remaining technical potential of these measure in 2013 is described in Annex A, along with their associated costs. The housing survey results have been adjusted to reflect this estimate of potential. The impacts of measures on a home's modelled energy consumption are estimated using the Standard Assessment Procedure (SAP 2005) for energy rating of dwellings¹²³. This is based upon the average house characteristics for each segment of the model with some values imputed from other characteristics. Adjustments have been made to the original SAP calculation of energy saving delivered by different measures as set out in Annex A. This adjustment rescales the average savings from measures installed in semi detached houses in the model to match the savings in a typical 3 bed semi detached house. The estimated impacts of measures in the other house-types have been scaled using the same percentage¹²⁴.

Modelling Uptake

This section first outlines the sequence of steps that are modelled each year to determine the uptake of energy efficiency measures. It highlights several key parameters that are used to estimate the demand for measures under the Green Deal.

Decision Sequence

The GDHM estimates consumer uptake of the Green Deal by simulating consumer decisions for each segment of the housing stock in each year of the simulation period (2013-2022). This is based on the following six steps:

- a) A fraction of each housing stock segment is assumed to make a decision whether to take up a Green Deal - the "*decision making frequency*" or "*trigger point frequency*".
- b) The expected year 1 total bill savings are calculated for each eligible package of measures using the technical energy saving delivered and the relevant fuel price.

¹²¹ See annex 3 in : <http://www.decc.gov.uk/assets/decc/Consultations/warm-front-eligibility/1442-ia-warm-front-eligibility.pdf>

¹²² The stock of homes lived in by other households has been correspondingly scaled down.

¹²³ <http://projects.bre.co.uk/sap2005/>

¹²⁴ Analysis of the relationship between the difference between theoretical performance and that observed in recent analysis of data from the National Energy Efficiency Data-framework, showed no consistent relationship between "underperformance" and dwelling size. DECC(2011) "Development of NEED and initial analysis" <http://www.decc.gov.uk/media/viewfile.ashx?filetype=4&filepath=11/stats/energy/energy-efficiency/2078-need-data-framework-report.pdf>

- c) The Green Deal charge is calculated, based on the assumed interest rate, the length of the repayment period and the installation cost of the measure (after deducting the assumed ECO subsidy).
- d) For each option that meets the Golden Rule¹²⁵, a consumer “utility” score that reflects the desirability of each option is calculated. The utility score reflects the value consumer place on future energy price rises, but the Golden Rule calculation does not.
- e) The utility score weights the characteristics of the package offered to the consumer. These weights are based on consumer *choice coefficients* that have been estimated by fitting a logit model to the Green Deal consumer survey responses. The characteristics that are included are:
 - i. The measure itself – reflecting consumers’ bias for or against any particular measures
 - ii. The expected net bill saving (after deducting the Green Deal charge)
 - iii. The repayment period
 - iv. The cost of the assessment
 - v. The upfront cost (zero for Green Deal measures)
- f) The take-up of each option is based upon the relative utility of each available option, including a ‘do nothing’ option. The utility is derived by combining the coefficients and the characteristics for a given option.

Demand Parameters and Their Influences

The key consumer demand parameters are: the decision making frequency, the consumer choice coefficients, and the characteristics of the offer to consumers (in particular the expected future bill savings¹²⁶). Each of these is discussed in turn, highlighting the evidence and assumptions that have been used to arrive at parameter values.

Customer Decision Making Frequency

The decision making frequency represents the rate at which households are presented with the same choices presented to the respondents to the Green Deal consumer survey. There are a range of triggers that could lead to a household considering whether to take up a Green Deal. Initial estimates of decision making frequency for the owner occupier sector have been derived from responses to the consumer survey.¹²⁷ These results broadly correspond to other surveys of consumer behaviour.^{128,129,130} This suggests using decision making frequencies for cavity wall

¹²⁵ Where the year 1 bill saving exceeds the Green Deal charge in year 1.

¹²⁶ The other characteristics of the offer to consumers are largely determined and described by the assumptions set out in Annex A.

¹²⁷ Respondents were asked if they had taken up or considered taking up a insulation measure in the past 12 months.

¹²⁸ Energy Saving Trust (2010) “Trigger points: a convenient truth: Promoting energy efficiency in the home”. p5. 22% of homeowners were considering a refurbishment, 85% of whom (i.e. 19% of all homeowners) would consider stretching their budgets to install energy efficiency measures within 3 years.

¹²⁹ BERR (2008) “The growth potential for Microgeneration in England, Wales and Scotland”, p 29. 14% of respondents considered installing insulation in the previous year.

¹³⁰ One discrepancy is the proportion considering cavity wall insulation appears to be higher than in the earlier surveys. This is plausible since the survey was carried out in early 2011; this is a period towards the end of the

insulation of 26% per year for owner occupiers relating to cavity wall insulation and 6% for solid wall insulation. This decision making frequency is expected to vary over the Green Deal period for several reasons.

Customers will become increasingly familiar with solid wall insulation, currently a relatively new measure with around 100,000 expected to have been installed by 2013. The consumer survey found that 15% of those with solid walls were unaware that the measure was a possibility; the corresponding figure was around 3% for cavity wall and loft insulation. Increased consumer awareness is assumed to therefore increase the decision making frequency to around 8%.

The high level of decision frequency observed for cavity wall insulation results from the activity of energy companies under the Carbon Emissions Reduction Target¹³¹. It is expected that under the Energy Company Obligation this activity will switch to the promotion of solid wall insulation, as cavity wall insulation is proposed as a qualifying measure in limited circumstances only.

Further to this there are several other potential supporting policies that are expected to increase the number of circumstances where householders consider Green Deal home improvements. This includes anticipated promotional activity by Green Deal providers and energy companies in combination with a government sponsored independent advice service that are expected to increase customer awareness and confidence in Green Deal opportunities beyond that found amongst respondents to the 2011 survey. In addition, other policies such as the roll out of smart meters, improvements to energy performance certificates, the renewable heat incentive and feed-in-tariffs provide an opportunity to encourage consideration of domestic energy efficiency improvements and the Green Deal financing mechanism.

To reflect the combination of consumer awareness, additional supporting policies and energy company activity the demand scenarios are based on a range of decision making frequencies for solid wall insulation; from 5% (low) to 10% (central) and 15% (high).

Customer Choice Coefficients

Consumer choice coefficients were derived from responses to a “stated preference exercise”. This exercise involved each survey respondent being asked to pick one of four improvement packages. Each “forced choice” was followed by a question about whether they would take up the package they had selected. This design enabled the collection of information about choices between attributes for a larger range of consumers, whilst still providing results that enabled actual uptake to be estimated.

Each respondent was offered around 6 sets of choices of different packages, each with different attributes. Some of these packages would require subsidies to deliver the net bill savings presented to the respondents. The range of packages tested therefore implicitly included a range of subsidies.

CERT period when suppliers activity in promoting Cavity wall insulation is likely have been concentrated over a smaller number of remaining unfilled cavities.

¹³¹ Around 1.5m Cavity wall insulation measures have been delivered by suppliers in the period 2008-2010 under the CERT scheme, see, <http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/CU/Documents1/CERT%20newsletter%20issue%2012%20June%202011.pdf>

The baseline estimates reflect the weight placed by respondents to the survey on each of the characteristics that was tested. These were derived by regression to fit a “logit” utility function to the choices made by respondents. The resultant coefficients are summarised in Table 45. Models were tested for a range of different consumer segments including:

- Environmental attitudes (“I’m environmentally friendly in most or all the things I do”);
- Solid wall versus other measures;
- Moving house within 3 years;
- Owner occupier / private renters;
- Household income;
- “Likely to take up the Green Deal”;
- Respondents who find their home “hard to heat”; and
- A vulnerable and low income group versus non-vulnerable group.

Of the variables tested, splitting the sample according to the low income and vulnerable group provided the largest improvement in the model fit while allowing the calculation of statistically significant coefficients for all of the Green Deal attributes.

The first set of coefficients describes characteristics of the package that exist for all measures: the possibility for upfront payment of a share of the costs was included in the survey, as well as attributes covering the assessment costs, the net energy bill savings, and the length of the repayment term.

The second set of attributes describes the consumers’ attitudes towards the measures themselves. Measures were presented in the survey alongside descriptions of the impact on the house and living space in terms of changes in appearance or usable floor area, along with additional household time or hassle that may be experienced during installation. These provide a combined “bias” against a measure and the associated hassle cost for each measure. The “biases” against solid-wall insulation were generally much larger than for other measures, which might be expected as they represent more significant changes to a building’s fabric and imply a larger degree of hassle associated with installation.

Table 45 Consumer coefficients

Characteristics of package	Consumer coefficients	
	Affordable Warmth group	Other households
Upfront cost (£)	-0.0003	-0.0003
Assessment cost (£)	-0.0005	-0.0003
Savings - fixed interest risk (£)	0.0017	0.0034
Savings - variable interest risk (£)	0.0013	0.0031
Repayment - 5 years	0.0000	0.0000
Repayment - 10 years	-0.1167	-0.1230
Repayment - 20 years	-0.1443	-0.3394
Repayment - 25 years	-0.1186	-0.3632

SWI internal	-2.5500	-2.1666
SWI external	-2.1546	-2.0644
CWI	-1.4522	-1.3087
Loft top up	-1.1467	-0.8613
CWI + boiler	-1.8325	-1.4628
Loft top up + CWI	-1.5382	-1.3866

Diagnostic Testing

For the individual coefficients in the final choice model, 25 out of the 32 parameters used (16 each for the priority and non-priority group datasets) were statistically significant with p-value <0.05. The non-significant parameters were retained in the model since excluding them (i.e. setting their value to zero) would create implausible responses for 1 or 2 out of the 10 measures.

A true R^2 value does not exist in logistic regression, but there are numerous possible methodologies that can be employed instead.

In this case, for testing overall model fit, a log likelihood score for the chosen model was calculated. This can be compared with the log likelihood value from a 'null model', one that includes only the constants for each technology but no other parameters. When this was done the choice model specification implemented in the Green Deal model resulted in a statistically significant improvement in the goodness of fit relative to the null model.

The Utility Function

The probability of uptake of a given measure is $1 / 1 - e^{-z}$ where z , the utility function, is calculated by combining the above coefficients as follows:

$$z = \text{calibration coefficient} * (\\ \begin{aligned} & (\text{upfront installation cost} * \text{upfront cost coefficient}) \\ & + (\text{assessment cost} * \text{assessment cost coefficient}) \\ & + (\text{net bill saving} * \text{bill savings coefficient}) \\ & + (\text{length of repayment period coefficient}) \\ & + (\text{measure coefficient}) \end{aligned})$$

Where net bill saving =
 $(\text{the bill saving delivered by the measure} * \text{future value of bill savings})$
 $- (\text{annual Green Deal repayment} * \text{future value of repayments})$

This methodology is illustrated in Table 46 for three example households (it is assumed that the golden rule is met in all cases). This is based on a flat nominal charge and excludes upfront costs (and upfront assessment costs) for explanatory purposes.

Table 46 Progress of steps to calculate insulation measure uptake in the GDHM

Inputs			
Wall type	Solid Int	Solid Ext	Cavity
House Stock	100,000	100,000	100,000

Tenure	Owner Occupied		
Bill Saving (A)	£560	£135	£314
Amount CO ₂ saved (tCO ₂)	74.52	70.56	48.72
Subsidy level (@ £80 pa per tCO ₂)	£5,962	£5,645	-
Installation cost	£8,147	£10,650	£500
Entire cost (includes assessment costs, Green Deal mechanism costs)	£2,185	£5,005	£500
Repayment term	20	20	10
Yearly repayment (includes cost reduction from subsidy) (B)	£214	£491	£73
Consumer choice model			
Calibration coefficient (C)	2	2	2
Future value per £ of bill saving (£) (D)	1.3689	1.5293	1.3898
Bill saving coefficient (E)	0.00341	0.00341	0.00341
Future value of £ of rise in repayment (F)	1.1961	1.1961	1.0798
Repayment term coefficient (G)	-0.3394	-0.3394	-0.1230
Measure coefficient (H)	-2.1666	-2.0644	-1.3087
Utility calculation			
'Utility' = $C * [((A * D - B * F) * E) + G + H]$	-1.5322	-7.4042	-0.4235
Exponent of Utility Function			
This measure	0.2160	0.0006	0.6547
Exponent of Utility Function including other eligible measures			
Int SWI	0.2160	0.1500	
Ext SWI	-	0.0006	
CWI	-		0.6547
Loft	-		1.5947
'Do Nothing'	1	1	1
Uptake Share			
Int SWI	17.8%	13.0%	-
Ext SWI		0.05%	-
CWI	-	-	20.1%
Loft	-	-	49.1%
'Do Nothing'	82.2%	86.9%	30.8%
Decision making frequency (DMF)	10%	10%	26%
Total number of installations (uptake share x DMF x house stock)			
Int SWI	1,777	1,304	-
Ext SWI	-	5	-
CWI	-	-	5,239
Loft	-	-	12,760
No uptake	98,223	98,691	82,001

There are several reasons for why these coefficients may not be representative of the ultimate preferences of those who are offered Green Deal packages:

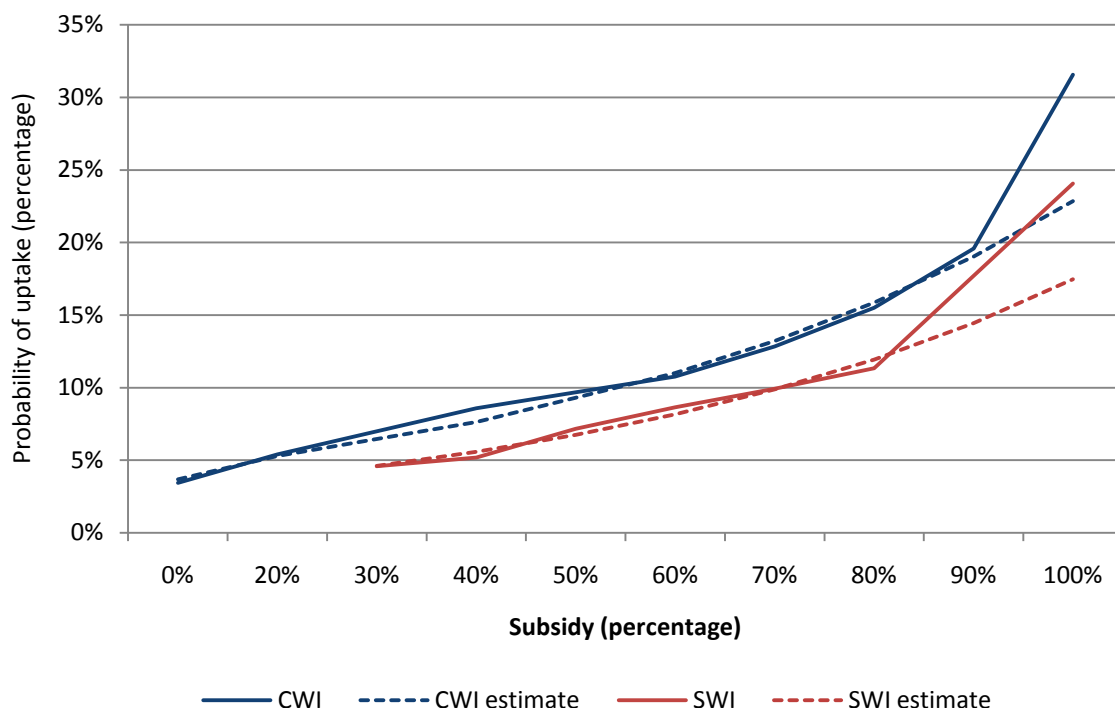
- The survey tested “white label” products rather than “market ready” products that will have been designed to appeal to consumers in different situations;
- The survey was based upon a limited range of choices and characteristics. In reality providers will be able to offer products that differ in other ways, and present those differences to consumers;

- The possibility of subsidies was not explicitly mentioned;
- The market is likely to target its activity on those more likely to respond; however, the survey attempted to capture a cross section of all private households;
- Estimates assume 100% awareness of the Green Deal: if awareness levels are lower, then uptake levels will be lower;
- Estimates are a snapshot in time based on respondents' current financial, economic and household situation;
- Estimates will be sensitive to changes in the economy, interest rates, etc.;
- Estimates may be influenced by good/poor reputation, word of mouth, press, marketing, etc; and
- The reputation of the Government as a supplier of information/accreditation as well as the partners providing the work will all impact consumer preferences.

Customer Choice Coefficients at High Levels of ECO Subsidy

An additional consumer preference survey was carried out to investigate the supposition that high rate of subsidy has a proportionally larger impact on consumer uptake (see annex L for more details). The first survey suggested that 32% of respondents would be more likely to make their home more energy efficient if subsidies or grants were available, but the possibility of subsidies was not mentioned and the highest implicit subsidy offered in the conjoint experiment was 80%. The additional survey asked similar questions to the original survey, but also asked consumers whether they would take up CWI or SWI given different levels of subsidy (and corresponding net bill savings). The results indicated that high rate of subsidy did have a particular impact of uptake and shown in Figure 34 below

Figure 34 Relationship between subsidy rates and consumer demand for insulation measures



By comparing the actual results with a prediction based on the lower rates of subsidy the following relationship was established.

- For SWI, for each ECO subsidy percentage point above 80%, the take-up is estimated to be 1.9% higher than it would otherwise have been by extrapolating the initial bill saving coefficients (for a maximum of 38%)
- For CWI, for each ECO subsidy percentage point above 90%, the take-up is estimated to be 3.5% higher than it would otherwise have been by extrapolating the initial bill savings coefficient (for a maximum of 35%)

These high-subsidy coefficients were incorporated by increasing the estimated sales by the appropriate amount for each housing type where the ECO subsidy is higher than 80% (SWI) or 90% (CWI).

Supporting Policy in the Private-Rented Sector

Supporting policy in the private rented sector is assumed to increase uptake in all PRS homes that are rated below the minimum standard (E rating). The Energy Act 2011 enables Government to regulate to help ensure the take up of cost effective energy efficiency improvements in the Private Rented Sector. Government's intention is that:

- from April 2016, domestic landlords should not be able to unreasonably refuse requests from their tenants for consent to energy efficiency improvements, where financial support is available, such as the Green Deal and/or the Energy Company Obligation; and
- from April 2018, all private rented properties (domestic and non-domestic) should be brought up to a minimum energy efficiency standard rating, likely to be set at EPC rating "E". This requirement would be subject to there being no upfront financial cost to landlords. The intention is that landlords would have fulfilled this requirement if they had either reached "E" or carried out the maximum package of measures funded under the Green Deal and/or ECO (even if this does not take them above an "F" rating).

To reflect this in the central modelled scenario an adjusted decision making frequency has been applied to all F and G rate private rented sector properties. This reflects the rate at which landlord will act in anticipation of the regulations coming into force in 2017, and the rate at which they will be required to comply with the regulation after 2017. The assumption is based on the turnover of private rented tenants. The decision making therefore increases from 2013 to 2017 and then remains constant at 35%.

Furthermore F and G rated PRS households are assumed to undertake at least one of the options available to them that meets the Golden Rule (their choices are split proportionately among all Golden Rule compliant choices in accordance with the utilities that would have applied were the home modelled as part of the owner occupied sector). Within the model this is achieved by removing the 'do nothing' option from these housing types. This does not reflect the 'tenant requests' element of the regulations.

Monitoring, enforcement and sanctions for compliance with the PRS regulations is yet to be determined, so a working assumption of 75% compliance has been used. This assumption reflects exemptions as well as non-compliance, and is made solely for the purposes of modelling Green Deal uptake in the Green Deal Household Model. Exemptions will be set in secondary regulations, and a

full Impact Assessment will accompany the consultation on PRS secondary regulations when further details on the possible exemptions are known.

Supporting Policy in the Social Housing Sector

The social housing sector has historically been active in undertaking energy efficiency improvements under previous energy efficiency schemes. A number of Local Authorities and Social Housing Providers have expressed an interest in the Green Deal as a mechanism for further improvements. In addition improvements in the Local Authority housing stock are likely to contribute to requirements of the Home Energy Conservation Act (HECA). To model this increased likelihood of social housing take-up, the social sector is modelled by assuming that 100,000 SWI and 140,000 CWI 'decisions' are made each year, i.e. the decision making frequency is set each year to equal 100,000 or 140,000 as a percentage of the untreated housing stock at the beginning of that year. The social housing associations are assumed to take-up of at least one of the packages if it meets the Golden Rule.

Expected Net Bill Savings

The GDHM uses an adjusted value of energy savings to consumers to reflect consumers expectations of likely increases in energy retail prices. The annual bill saving is scaled up to reflect the weighted average discounted retail price of the relevant fuel over the lifetime of the measure¹³².

Consumers are assumed to discount these future energy price using a "quasi-hyperbolic" discount rate. This involves using discount rate of 9% but reducing the discount factor to 60% for all benefits beyond year 1¹³³.

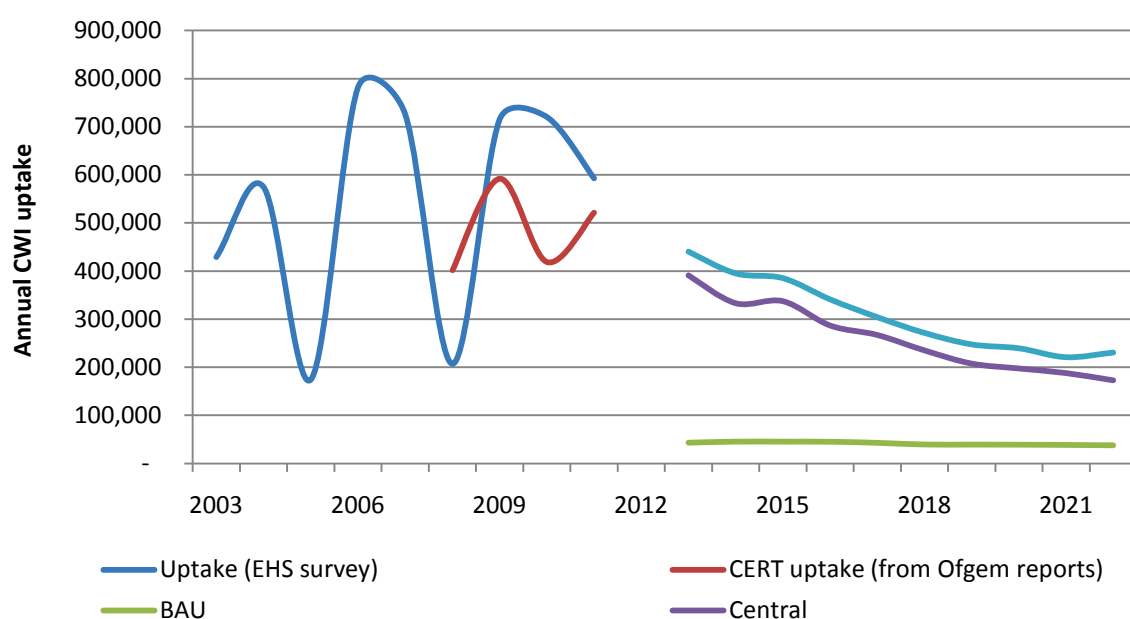
Calibration of demand scenarios.

The Green Deal uptake scenarios cannot easily be calibrated to historical sales because current policies such as CERT are structured differently, permitting delivery of a wider range of measures than is proposed for ECO. Solid wall insulation has yet to be extensively promoted to owner occupiers under CERT, and loft insulation has been focussed on lofts with lower baseline levels of insulation and therefore these installations offer better value than those taken up under ECO/Green Deal. The most similar measure that can be modelled is cavity wall insulation. The chart below presents the historical sales of CWI and the levels predicted by the model.

¹³² These are based on the projected retail prices stated in the supplementary Green Book guidance on valuing changes in energy use. Whilst consumers are assumed to be long sighted in this scenario, they are assumed to have a private discount rate of 9% per year in nominal terms. This is 2 percentage points higher than the consumer interest rate assumed in the central scenario.

¹³³ This model of quasi-hyperbolic discounting is used by, Laibson, D. (1997): "Golden eggs and hyperbolic discounting", *The Quarterly Journal of Economics*, 112(2), 443:77.

Figure 35 Historical and projected uptake of CWI



Green Deal Finance Cost Calculations

The modelled Green Deal finance costs are achieved by first calculating the *entire* installation cost. This consists of the installation cost of the package as well as the assessment cost, the Green Deal set-up cost, and the annual Green Deal administration cost. See Annex A for more details on these quantities.

The Present Value of the annual Green Deal administration cost is calculated for each measure at the appropriate interest rate and loan repayment period, and this is added along with the assessment and set-up costs to the Installation cost.

It is from this entire cost starting point that the optimised ECO subsidies are subtracted for each measure / housing type, leaving the amount of Green Deal finance; see example below:

Table 47 Example Green Deal finance cost calculation

Installation Cost	Assessment Cost	Green Deal Set-up Cost	Green Deal Annual cost	PV (annual cost @ 7.5% interest, 20 years)	Entire Cost	ECO Subsidy	Green Deal Finance amount
£6,000	£112.5	£16	£8	£81.56	£6,210	£3,000	£3,210

Energy Company Obligation

Different elements of the obligation are modelled separately.

1. The Carbon Saving and Carbon Saving Communities targets – carbon emissions reductions achieved through the installation of insulation in all homes
2. Affordable Warmth via insulation measures – installation of loft and cavity wall insulation in homes that count towards the Affordable Warmth target.

3. Affordable Warmth via heating measures.

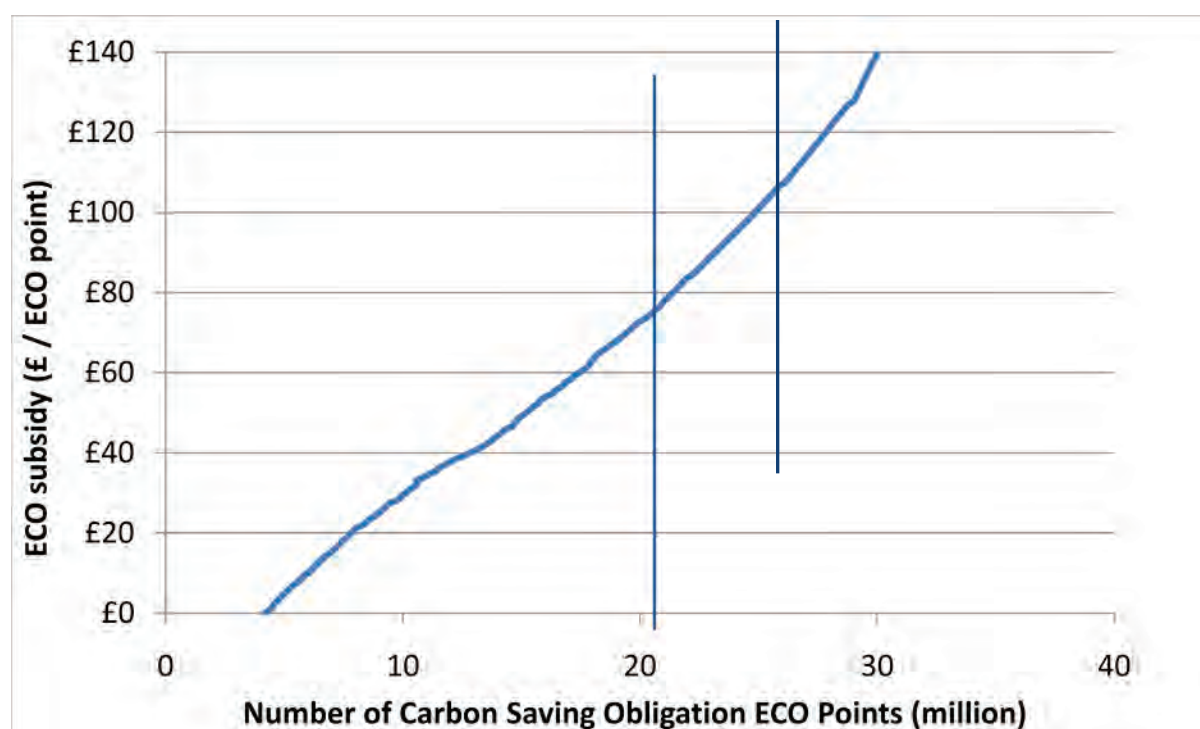
Element 1 is modelled using the GDHM with Elements 2 and 3 being modelled as described in Annex D.

The ECO Carbon targets are modelled as a subsidy offered to consumers that reduces the annual Green Deal repayment. The GDHM works by analytically setting the optimal subsidy for each of the 3,866 housing types. To achieve this, ECO point supply curves are derived. The model iterates upwards from £0, in steps of £25 per ECO point (lifetime tCO₂ saving), calculating:

- a) *For each housing type* the subsidy per measure for a given subsidy per ECO point (i.e. a SWI that saves 1.2 tCO₂ will receive £120 if the subsidy is £100 per ECO point)
- b) the uptake of measures (i.e. number of installations) resulting from that level of ECO subsidy
- c) the total amount spent given the total number of ECO points

The model increases the ECO subsidy per point and recalculates the number of installations and total cost of installations. This process is repeated until the full supply curve has been calculated. The model then selects £ per ECO point subsidy that corresponds to the carbon target for that interim period. The targets will be fixed for the first interim period, but will be revised for the following periods in 2015 and 2018. The sensitivity analysis therefore uses the central carbon targets for the first interim period, but uses revised targets in the second and third periods, to reflect reviews in 2015 and 2018.

Figure 36 Central ECO point supply curve for Carbon Saving target (CO₂)



The optimised ECO subsidy enters into the consumer uptake function as described above by reducing the annual Green Deal repayment that consumers face. Higher subsidies result in higher

net bill savings for the consumer and the measure is therefore more attractive, thus increasing the utility function for that measure and consequently the take-up.

The cost of the total obligation is based on the subsidy required to deliver the target. The ECO Carbon Target is modelled as three interim targets (2013-2015, 2016-2018 and 2019-2022) and the target is based on the each interim target as a whole. The inter-temporal pricing of ECO points is assumed to incorporate a cost of carry of 9%. A subsidy rate of £100 / tCO₂ point in 2015 therefore corresponds to a subsidy rate of £91.7 in 2014 and £84.2 in 2013. This leads to higher uptake in the later periods of each interim target.

Additional Measures - Uptake of Insulation Packages

The Green Deal and ECO consultation document set out the Government's vision of a whole-house approach to energy efficiency being adopted, where households are encouraged to install a package of measures, as opposed to just one measure on its own. The GDHM functionality has been improved to better account for this whole house approach, and the assumptions for the uptake of packages are described below.

There are a number of reasons why a household may choose to install a package of measures, and why government would want to support this sort of approach, as:

- it would allow measures to be delivered more cost effectively as some of the fixed installation and hassle costs would be spread over a larger number of measures;
- it would allow improvements to be tailored to one another avoiding, for example, an expensive, high output heating system being installed just before the heat requirements of a house drop due to a package of insulation being installed; and
- the decision making frequency of households for installing energy efficiency measures is low, meaning a whole house approach could guarantee a greater roll-out of energy efficiency measures¹³⁴.

Whether a household chooses to install a package of measures will depend on their preference for the measures, the cost of the package, how much of the package can be Green Deal or ECO financed and whether they have access to alternative sources of capital. The marginal decision associated with installing additional measures would be based only on the installation cost associated with the measure, and would not include the Green Deal mechanism costs which would have been incurred for the installation of the first measure.

Table 49 below shows that draught-proofing, new or replacement storage heaters and floor insulation all appear to be attractive package measures to install using Green Deal finance (column H). It also illustrates that, of the main insulation measures, only easy to treat CWI attracts an amount of Green Deal finance greater than the total cost of installation. This headroom could be used to cross-subsidise measures and makes CWI a possible trigger for the uptake of a package of measures.

¹³⁴ For example, around 26% and 24% of respondents to the consumer insight survey accompanying the consultation said they would only consider installing energy efficiency measures 4-10 years and 10 years or more after moving into a house. See <http://www.decc.gov.uk/assets/decc/11/consultation/green-deal/3503-green-deal-consumer-research-topline.pdf>.

Under the ECO, floor insulation, loft insulation and draught-proofing appear to be attractive measures to package alongside SWI or HTT CWI as the ECO subsidy received for these measures would exceed their cost of installation. That is, some of the ECO subsidy could be used to reduce the cost associated with installing SWI. In addition, whilst the ECO subsidy available for glazing as a proportion of its cost is low, the absolute figure is high. It is expected that there will be a high take up of glazing in the business as usual scenario driven by building regulations and therefore the Green Deal and ECO are not assumed to drive additional uptake of glazing (see section above).

These arguments, along with information on the technical potential and hassle costs associated with each possible package measure, have been factored into the uptake calculations in the GDHM and are summarised below. The technical potential figures have been calculated using data from the EHS, looking at the proportion of un-insulated cavity wall and solid wall properties which also have the technical potential for the package measures considered. This has been multiplied by a preference factor to determine the uptake factor in column D.

Table 48 Package assumptions for GDHM

Measure	Technical potential as proportion of main insulation stock	“preference factor” (% of households offered which take up measure)	Proportion installed
Packaged with CWI using Green Deal finance			
Flue gas heat recovery (with boilers)	20% of boilers are packaged with flue gas heat recovery		
Draughtproofing (with CWI)	6%	80%	5%
Loft insulation (with CWI)	Package included in the GDHM		
Packaged with SWI accessing ECO subsidy			
Loft insulation (packaged with SWI)	27%	80%	22%
Draught-proofing and Glazing (packaged with SWI)	9%		
Floor insulation (packaged with Internal SWI)	44%	40%	18%
Floor insulation (packaged with External SWI)	44%	10%	4%

Table 49: Energy savings, Green Deal finance and ECO subsidy available for eligible measures

Measure	Energy saving (kWh per year)	Installation cost	Total Green Deal Plan cost ⁽¹⁾	Assumed max Green Deal term ⁽²⁾	Year 1 bill saving	Green Deal finance available for measure	Proportion of total cost (D) which can be Green Deal financed (on own)	Proportion of installation cost (C) which can be Green Deal financed (package)	ECO subsidy available for measure with SWI or HTT CWI	ECO subsidy headroom (installation cost less subsidy available)
A	B	C	D	E	F	G	H	I	J	K
CWI (easy)	2673	£500	£796	10	£133	£985	124%	197%	£1,599	£1,099
CWI (hard to treat)	2673	£1,875	£2,171	10	£133	£985	45%	53%	£1,599	-
Internal SWI	5494	£5,300	£5,623	20	£273	£3,223	57%	61%	£2,817	-
External SWI	5494	£9,950	£10,273	20	£273	£3,223	31%	32%	£2,817	-
Loft insulation (top up)	499	£300	£596	10	£25	£184	31%	61%	£299	-
Non condensing gas boiler to condensing gas boiler in the year 2013. The savings will reduce as the boiler efficiency improves in the future	1962	£2,500	£2,796	10	£97	£723	26%	29%	-	-
Floor insulation	1084	£400	£723	20	£54	£636	88%	159%	£648	£248
Heating controls ⁽³⁾	495	£450	£746	10	£25	£182	24%	41%	-	-
Flue Gas heat recovery (condensing combi boiler)	666	£400	£696	10	£33	£246	35%	61%	-	-
Hot water cylinder insulation (top up) ⁽³⁾	417	£30	£326	10	£21	£154	47%	512%	-	-
Double Glazing (old single to A)	2280	£4,500	£4,796	10	£113	£840	18%	19%	£649	-
Double Glazing (C to A)	190	£4,500	£4,796	10	£9	£70	1%	2%	£54	-
Secondary glazing	1657	£1,250	£1,546	10	£82	£611	40%	49%	£472	-
Flat roof insulation	2752	£1,050	£1,346	10	£137	£1,015	75%	97%	£784	-
Room in roof insulation	-	£2,100	£2,396	10		-	-	-	-	-
High performance replacement doors	317	£1,000	£1,296	10	£16	£117	9%	12%	£135	-
Draughtproofing	649	£100	£396	10	£32	£239	60%	239%	£92	-
Lighting systems and fittings	97	-	£273	5	£5	£20	7%		-	-
Cylinder thermostat ⁽³⁾	2169	£300	£596	10	£108	£800	134%	267%	-	-
New or replacement storage heaters	1083	£350	£646	10	£54	£399	62%	114%	-	-
Replacement warm-air unit	433	£1,750	£2,046	10	£21	£160	8%	9%	-	-
Condensing oil boiler	0	-	£296	10	£0	-	-	-	-	-
Under-floor heating	0	£5,000	£5,296	10	£0	£0	0%	0%	-	-
Waste water heat recovery systems	0	-	£296	10	£0	£0	0%		-	-

Measure	Energy saving (kWh per year)	Installation cost	Total Green Deal Plan cost ⁽¹⁾	Assumed max Green Deal term ⁽²⁾	Year 1 bill saving	Green Deal finance available for measure	Proportion of total cost (D) which can be Green Deal financed (on own)	Proportion of installation cost (C) which can be Green Deal financed (package)	ECO subsidy available for measure with SWI or HTT CWI	ECO subsidy headroom (installation cost less subsidy available)
A	B	C	D	E	F	G	H	I	J	K
Biomass boiler	-	£9,000	£9,296	10	£0	£0	0%	0%	-	-
Biomass room heater with boiler	-	-	£296	10	£0	£0	0%		-	-
Solar water heating	1336	£4,500	£4,796	10	£66	£493	10%	11%	-	-
Photovoltaics	1595	£12,000	£12,296	10	£79	£588	5%	5%	-	-
Ground source heat pump ⁽⁴⁾	-205	£12,000	£12,296	10	-£10	-	-	-	-	-
Air source heat pump	-553	£7,500	£7,796	10	-£27	-	-	-	-	-
Micro CHP	-	£5,500	£5,796	10		-	-	-	-	-
Building mounted wind turbine	570	£3,200	£3,496	10	£28	£210	6%	7%	-	-

This table makes assumptions about the characteristics of a property before installing an improvement measure, for example it assumes average building characteristics for a home in 2006 and that heating measures are assumed to replace less efficient systems of the same type. These savings include the adjustments made for inaccessibility and in-use factors. The actual savings will vary and will be determined for the specific property in the Green Deal assessment. The energy and bill savings and installation costs in this table are for a representative 3-bed semi-detached property with gas central heating. In reality there is a large variation in these figures between different house types. There are therefore a large number of households for which the Green Deal Finance will be able to cover a larger proportion of the costs.

- (1) Column D shows the total GD plan cost, which is the cost of the measure, cost of assessment and interest payments associated with the GD plan, reflecting the assumptions which have been used for the GD modelling. This is therefore a present value of all the costs as the interest payments will be paid in the future.
- (2) Assumed maximum Green Deal term is less than actual lifetime of measure to reflect consumers' potential aversion to taking out Green Deals with long term repayment schedules
- (3) Hot water cylinder insulation and cylinder thermostat savings and heating controls assume nothing is currently present, which overestimates the savings. The savings are therefore uncertain and have not been included in the packages analysis above
- (4) The savings for ground and air source heat pumps were derived by comparison with the base case dwelling, with a gas boiler. While this saves energy, the switch from gas to electricity results in greater costs.
- (5) Column I illustrates the proportion of the installation cost of the measure that can be financed through the Green Deal when the measure is added to a package of other measures (and so does not include the Green Deal mechanism cost that would have been incurred anyway). Column H shows the proportion of the total package costs that can be financed through the Green Deal when the measure is installed on its own (in this case the Green Deal Finance also has to cover the Green Deal mechanism costs). Column J shows the projected ECO subsidy available when the measure is packaged alongside solid or hard to treat cavity wall insulation. The actual subsidy will depend on a wide range of factors, such as energy company behaviour. Column K

Green Deal Finance contributions for other measures.

The GDHM calculates the uptake of the main insulation measures as a result of introducing the Green Deal and ECO. However, the Green Deal will also be used to part finance other measures. Two measures that are expected to be sold at scale are boilers and double-glazed windows. The analysis that follows assumes that some of the uptake of these two measures will now be financed by the Green Deal. **The impact of these measure is not included in the NPV of the policy presented in the this Impact Assessment. These measures would be installed if the policy was not introduced and so do not contribute to the energy and carbon savings impact of the policy. They are included for the purpose of estimating the total amount of Green Deal finance only.**

Boilers

There are currently an estimated 1.5m¹³⁵ UK boiler sales in the UK and it is reasonable to assume that most sales would happen in the absence of Energy Supplier Obligations. The main exception is the 100,000 boilers that Warm Front currently delivers and will continue to be delivered through the Affordable Warmth obligation of ECO. It is assumed that a percentage of the remaining 1.4m boilers will be financed by Green Deal finance¹³⁶.

It is assumed that only boiler installations that will be condensing boilers replacing non-condensing boilers will produce enough energy savings to be worth the hassle costs of arranging a Green Deal. The number of condensing boilers replacing non condensing boilers has been estimated at 1,075,000 pa in 2013¹³⁷ falling to 833,000 in 2016 as boiler efficiency in the housing stock increases over time. A conservative assumption that all Warm Front/Affordable Warmth boilers are/will also be condensing replacing non-condensing, reduces this potential to 975,000 pa in 2013 falling to 733,000 in 2016.

The Green Deal stated preference survey estimates that 6% of people who need a boiler, will use Green Deal finance. This means 64,500 BAU boilers will be financed through Green Deal finance. This is likely to be conservative as business models provided by key providers predict far higher levels of Green Deal finance from boilers than is projected by the GDHM. For that reason we also model a high scenario of 12% choosing to use Green Deal finance. Anecdotal evidence from potential Green Deal providers say that sales are likely to be concentrated within the F and G boilers. The distribution of installations has therefore been weighted relative to the four different non-condensing boiler categories (see Table 50 below). Total volume of Green Deal finance is then given by multiplying remaining boilers by the amount financeable for its respective rating (see table). This gives **£66m** pa

¹³⁵ Source: extrapolating SEDBUK boiler sales

¹³⁶ It should be noted that the CWI and boiler packages the GDHM predicts, are considered additional to the 1.5m business as usual (BAU) and would not be installed in the absence of Green Deal&ECO. They are assumed to be cases where customers are only installing a boiler due to the availability to do so in conjunction with CWI within a Green Deal package. CWI and boiler packages are not considered in this analysis.

¹³⁷ Source: difference between 2012 and 2013 condensing boiler numbers obtained by extrapolating SEDBUK boiler sales

in 2013 falling to **£63m** in 2016.¹³⁸ In the High scenario this gives **£132m** pa in 2013 falling to **£126m** in 2016

Table 50 Green Deal finance contribution from BAU boilers in 2013

		Boiler rating			
Total number of condensing replacing non-condensing	975k	D	E	F	G
Percent of total installations taking Green Deal finance	6%				
kWh per year		1,485	2,344	3,299	5,253
kWh after 25% in use factor		1,114	1,758	2,474	3,940
Green Deal Finance per boiler (£)		451	712	1,002	1,595
% of condensing replacing non-condensing		12%	19%	27%	42%
No. of con rep non-con (000's)		117	185	260	414
No. of Green Deal installations (000's)		7.02	11.08	15.59	24.82
Green Deal finance contribution (£000's)		3,164	7,884	15,616	39,593
Total Green Deal finance (£m)		66			

Table 51 Projected Boiler sales and Green Deal finance volume from 2013-2022 taking into account varying energy prices over time

	Number of boilers (000s)	Boiler Green Deal finance (£m)
2013	58.5	66.26
2014	58.5	71.57
2015	58.5	73.36
2016	47	63.46
2017	47	61.65
2018	47	58.29
2019	47	59.01
2020	47	59.53
2021	47	59.66
2022	47	59.91

Glazing

5,794,000 double glazed windows are installed each year¹³⁹. Assuming eight windows are replaced in a typical house, this means 725,000 houses (2.8% of GB housing stock) replace windows each year. It is assumed that only windows with poor/no double glazing would access Green Deal finance as upgrading double glazing from C to A rating would only save £100 over its lifetime. The EHS suggests

¹³⁸ Note the volume of Green Deal finance also varies over these years due to fluctuating projected energy prices.

¹³⁹ D CLG market research

that around 2m English homes have no double glazing. Using the replacement rate for the GB stock, gives a single glazing Green Deal finance potential of 56,000.¹⁴⁰

The 6% of boiler installations that will use Green Deal finance is considered a lower bound preference factor for windows. Boilers are often distressed purchases to replace broken ones. In such a situation a consumer is less likely to forgo the burden of obtaining Green Deal finance than in a more planned purchase like new windows. A Green Deal finance preference factor of 20% is therefore used for the majority of these window replacements. However, around 1,000¹⁴¹ of the 56,000 potential will be installing glazing in conjunction with Green Deals for CWI or SWI. An increased Green Deal finance preference factor of 50% is assumed for these consumers as they are more likely to finance glazing if they are already taking out Green Deal finance for CWI/SWI.

This gives a number of windows part financed by Green Deal finance of 11,500. This is conservative as the Green Deal Finance Company (GDFC) projects a higher figure of around 40,000¹⁴². Total volume of Green Deal finance is then given by multiplying the number of windows by the amount financeable by Green Deal finance (this is assumed to be £1,100 for the majority of glazing but £1,700¹⁴³ for glazing packaged with CWI). This gives **£13m** pa.

Table 52 Double glazing window Green Deal finance sale projections pa

	All Glazing	Just Glazing	Glazing in conjunction with Green Deal CWI
No. homes with single glazing	2,000,000.00		
Replaced pa (assuming 2.8% replacement rate)	55,712		
% assumed replaced using Green Deal Finance		20%	50%
Number of Green Deal windows	11,442	10,942	500
Savings (£) per window		1,100	1,700
Total Green Deal Finance (£m)	12.89	12.04	0.85

As such, the boiler and glazing sales contribution to Green Deal finance volume is estimated at an average of **£76m** pa rising to **£139m** pa in the high boiler scenario.

¹⁴⁰ Whilst the possibility of laggards being over represented in this segment of the market is noted, it is hard to quantify and the overall loss from this effect may be compensated by some C to A upgrades.

¹⁴¹ EHS 2008 estimates 9% of un-insulated cavity and 18% of solid wall properties to have single glazing. Multiplying these percentages by CWI and SWI projected GDHM sales figures and then by the 2.8% replacement rate gives approximately 1,000 homes pa, that could decide to use Green Deal finance for insulation and glazing.

¹⁴² The Green Deal Finance Company assume a degree of additionality as it implies a replacement rate of single glazed windows above that of the current GB stock. Additionality has not been assumed in DECCs calculation.

¹⁴³ This includes £600 headroom for Green Deals on CWI that is drawn in by inclusion of glazing.

Equity Weighting

Equity weights were applied to different costs and benefits to capture the value to households of the inherent transfers associated with the scheme. Equity weights were applied in line with Green Book guidance¹⁴⁴ to the reduction in household energy bills, the comfort taken and to the hidden costs.

The equity weighting associated with each income decile is calculated as the ratio between the marginal utility of consumption for that decile and the average marginal utility of consumption across all deciles. These are calculated in accordance with Green Book guidance using the median level of income in each income decile. The marginal utility of consumption for each income decile is calculated using the Green Book methodology; assuming that the elasticity of the marginal utility is one, then this implies that the utility function is $U = \log C$ (where C is consumption). Consequently the marginal utility of consumption is $1/C$. In addition it is also assumed that the marginal propensity to consume is one therefore all income is spent on consumption. So for example the marginal utility for the lowest income decile is $1/7500 = 0.000133$.

Table 53 Equity weightings across income deciles

Unequalised Income Decile Group	Average Unequalised Income (2009)	Marginal Utility of Consumption	Equity Weight
1	£7,257	0.00014	3.84
2	£11,112	0.00009	2.51
3	£13,992	0.00007	1.99
4	£17,089	0.00006	1.63
5	£20,718	0.00005	1.34
6	£24,827	0.00004	1.12
7	£29,619	0.00003	0.94
8	£35,679	0.00003	0.78
9	£44,438	0.00002	0.63
10	£73,770	0.00001	0.38
Average Income:	£27,851	4.00E-05	

A range of cost and benefit transfers are taken into account. These are:

- Energy bill savings – for households receiving 100% ECO subsidy
- Energy bill savings – from future energy price rises for households receiving Green Deal measures
- Comfort taking
- The interest on the Green Deal charge
- ECO pass through cost onto consumer bills
- The economic surplus associated with the ECO subsidy
- Hidden costs to the householder

Installation costs under Green Deal and social benefits have not been considered for equity weighting as they are an investment and return to society and do not represent a transfer from one section of society to another. There are also a range of groups that are considered with a different

¹⁴⁴ Page 91 of the Green Book: http://www.hm-treasury.gov.uk/d/green_book_complete.pdf

distribution of the costs and benefits. The table below presents the spread across the different income groups under these different groups.

Table 54 Spread of benefiting households across income deciles for an illustrative vulnerable group proxy

Income Deciles	Affordable warmth group ¹⁴⁵	Non-Affordable Warmth group	Carbon Saving obligation group ¹⁴⁶	Distribution of ECO costs
1	0.15	0.09	0	0.07
2	0.23	0.08	0	0.08
3	0.22	0.08	0	0.09
4	0.2	0.09	0.14	0.1
5	0.11	0.10	0.14	0.1
6	0.05	0.11	0.14	0.1
7	0.02	0.11	0.14	0.11
8	0.01	0.11	0.14	0.11
9	0.01	0.11	0.14	0.11
10	0	0.11	0.14	0.12

The benefits and costs accruing to each decile subsequently receive the relevant equity weight and are summed across income deciles to represent the total equity benefit or cost. The net equity impact is then gained by subtracting from these totals the un-weighted hidden cost and comfort taken respectively, to avoid double counting the benefit or cost in the NPV figures.

The net equity impact hence represents the additional value of the benefit or cost to the household over the un-weighted value included in the un-weighted NPV.

Equity weighted energy bill savings

These benefits differ for separate parts of the ECO and Green Deal.

The first group is the Affordable Warmth group. It is assumed that this group will receive 100% ECO subsidy and thus will have energy bill benefits from year one. The total energy bill benefits for the lifetime of the measure are considered. These benefits are then assumed to be spread across the income deciles for households within the Affordable Warmth group before being multiplied by the income equity weightings and the difference between these and the non-equity weighted savings are presented.

The second group of energy bill savings is for homes receiving measures under the Green Deal and therefore not receiving a bill reduction in year one. However, due to expected energy retail price increases over time they will see future bill savings as a result of lower consumption. These bill savings are assumed to be spread across the non-Affordable Warmth group and the same methodology is followed.

¹⁴⁵ Spread of CWP and CTC <£16k across deciles

¹⁴⁶ This differs from the non-affordable warmth group as it assumes that no households below income decile 4 receive a measure.

Equity weighted hidden cost and comfort taken

The estimated hidden costs and comfort taken are distributed between income deciles according to the estimates of who receives measures – the table above presents this distribution for the Affordable Warmth and non- Affordable Warmth groups.

Equity weighted interest of the Green Deal charge

The interest of the charge is seen as a cost to households receiving Green Deal, however the benefit is faced by banks and their shareholders. This is then considered as a cost using the non-Affordable Warmth distribution, but the benefit is assumed to be distributed across all groups equally (assuming that shareholders are spread equally across society). The net result is the difference between the two.

ECO pass through onto consumer bills

It is assumed that all consumers will see bill increases as a result of funding the ECO. This is expected to be passed on as set out in Annex H. The difference between the equity weighted and non-equity weighted numbers will be used as the net equity weighted ECO bill increase impact.

Economic rent associated with the ECO subsidy

The economic surplus results from ECO subsidy level for each measure being set at the market clearing rate (see ECO mechanism cost section of main IA). This surplus will therefore be a transfer from household energy bill payers to either households receiving measures or installers/energy companies. This IA assumes that the households are beneficiaries of the surplus, and that this surplus accrues to the carbon obligation group as low income and vulnerable homes are unlikely to have sufficient bargaining power to ensure they receive the benefit. As the cost of the transfer is spread across all household bills the equal distribution group is assumed. The net equity weighted impact is the equity weighted benefit minus the equity weighted benefit.

Annex C: The Non-Domestic Model

Overview

Two separate models have been used to determine the impacts of the non-domestic Green Deal in this Impact Assessment. The first models the voluntary take-up of energy-efficiency financed through the Green Deal amongst the whole non-domestic building stock; the second models the impacts of a supporting policy of regulation of the private rented sector's (PRS) least efficient properties, requiring an improvement in their Energy Performance Certificate (EPC) rating. These models are run sequentially, with the outputs of the former feeding into the latter. This ensures that only the additional impact of the PRS supporting policy is accounted for. The models are described in turn below.

Three scenarios are modelled, which are characterised as follows:

- The **low** scenario assumes that there are preferences for quick pay-back bundles whenever these are available. If there are bundles that deliver greater savings over time, but do not pay back as quickly, then these are not taken up in the low scenario. It is also assumed in this scenario that there is some supporting policy in the private rented sector (PRS), but that a significant proportion of savings covered by this policy would not be deliverable in practice.
- The **central** scenario represents our best estimate of the impact of the Green Deal and supporting policies in the non-domestic sector. There is a tendency for consumers of Green Deals to have varied preferences when it comes to payback periods, but with a general tendency towards quick payback options¹⁴⁷. In this scenario, it is also assumed that there is some supporting policy in the PRS targeting F and G EPC-rated buildings, although there are limitations regarding the deliverability of this. These limitations relate to the number of exempted buildings, the number of buildings with long leases, and the level of non-compliance with the regulations.
- The **high** scenario is characterized by consumers preferring more comprehensive bundles, regardless of payback period, so long as the bundles pay back at some stage. This delivers a much higher level of savings, but requires a much bigger commitment from consumers. The scenario also assumes that there is good supporting policy in the PRS, requiring that all F and G EPC-rated buildings are required to improve their rating to at least an E whenever it is cost-effective to do so. Within this, it is assumed that a significant proportion of this is paid for with Green Deal finance, and that there are few buildings on which the policy will not have an impact.

Non-Domestic Voluntary Model

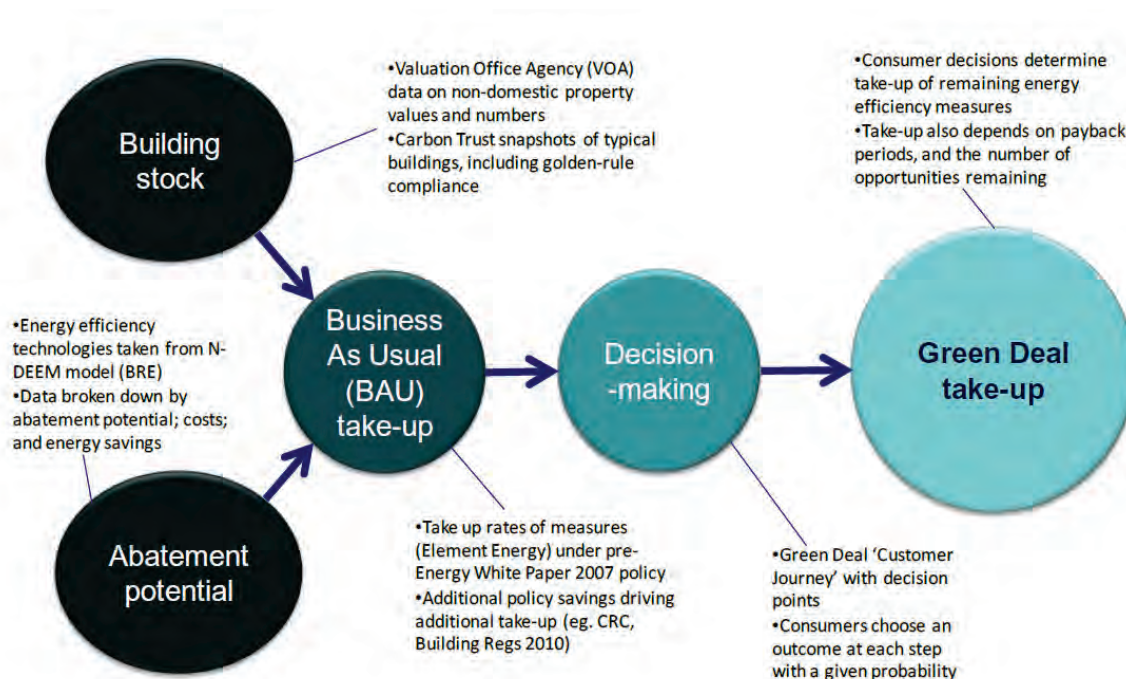
This model is used for the analysis of the impacts resulting from the voluntary take-up of the Green Deal in the non-domestic buildings sector. It takes as a starting point the likely cost-effective abatement potential of buildings by type of measure; it determines which measures are likely to

¹⁴⁷ From the Green Deal Business Survey: 12% of respondents said a payback period of less than 3 years would make them less likely to invest in Energy Efficiency, whereas this figure is 28% for 3-10 year payback and 39% for 10-25 year payback.

meet the Golden Rule to qualify for the Green Deal , then looks at the likelihood of different agents in the sector deciding to undertake a Green Deal.

The figure below presents the relationship between the various elements that contribute to the modelling. The main components of the model are summarised as follows:

Figure 37 Overview of the Green Deal modelling process



Building Stock Suitable for Green Deal Measures

Analysis commissioned by the Carbon Trust, from AEA¹⁴⁸ identified a sample of typical, but hypothetical, properties in different commercial sectors and assessed the bundles of measures that would be eligible for a Green Deal, based on compliance with the Golden Rule. For this work 20 snapshots were assessed, representing some of the most significant contributors to emissions in the non-domestic sector. The selection of snapshots was determined through a consideration of several factors including the stock of buildings in the sector, the aggregate 'unconstrained'¹⁴⁹ energy consumption of buildings in the sector, and AEA expert judgement. The snapshots included are listed in the table below.

¹⁴⁸ Analysis of Green Deal measures – payback in the non-domestic sector, with separate Excel spreadsheet, http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

¹⁴⁹ Those emissions not covered by the EU ETS, CRC Energy Efficiency Scheme, and Climate Change Agreements.

Table 55 Properties included in AEA analysis

Small office	Hotels and catering - Hotel in listed building
Medium office, single occupancy	Air conditioned prestige hotel
Medium office, multiple occupancy 1 floor on large building.	Small food shop
Large office including data centre	Medium size store in outlet centre
School in one medium sized building	Medium department store
Medium multiple building school	Large supermarket
Surgery (small building)	Medium sized leisure centre with swimming pool
Hospital (large building)	Heated warehouse - medium size. No cooling
Hotels and catering - Pub	Small industrial unit (light manufacturing)
Hotels and catering - B&B	Medium industrial unit

The specifications of each of these snapshots were determined according to judgement of what constitutes a 'typical' set of characteristics for the building, including size; age; building materials; occupancy; energy bills; and typical fabric. Following this, a choice of energy savings measures was determined, based on the relevance to the building; the speed of payback; the Green Deal eligibility criteria; and the need to consider a portfolio of savings measures. The energy savings and costs associated with these measures were also assessed. For each of these snapshots, the potential Green Deal measures were grouped into bundles to represent choices of energy savings packages that could be adopted under a Green Deal. Finally, these properties, bundles and measures are then aggregated by the non-domestic Green Deal model to determine the stock of buildings and Green Deal opportunities in the sector.

Data from the Valuation Office Agency (VOA) gives the number and rateable value of buildings by sector in the year 2010, to a substantial level of disaggregation. This information is used to provide a framework for aggregating specific snapshots of eligible buildings to a Great Britain total.

Business As Usual Profile of Measure Take-Up

The scale of abatement potential from Green Deal-type measures (those that are fabric measures that meet the Golden Rule) is estimated using the National Non-Domestic Buildings Energy and Emissions Model¹⁵⁰ (N-DEEM), together with technology penetration rates as estimated by Element Energy¹⁵¹. This produces a profile of what remaining potential for uptake of Green Deal measures is likely to be over the period in question. This potential is then adjusted for take-up brought about by other, non-Green Deal, policies, based on projected policy savings that are derived from DECC's energy model. This is to eliminate double counting of savings. The take-up of measures under the BAU and under the central scenario of the Green Deal is indicated below After 2022, it is assumed

¹⁵⁰ NDEEM was developed by the Building Research Establishment to provide an insight into energy use and abatement potential within the country's non-domestic properties. Christine Pout: "N-DEEM: The national non-domestic building energy and emissions model – an overview," in: Environment and Planning B: Planning and Design 2000, volume 27, pages 721-732

¹⁵¹ Element Energy – *Uptake of Energy Efficiency in Buildings* – 2009.

http://downloads.theccc.org.uk/docs/Element%20Energy_final_efficiency_buildings.pdf

the penetration of energy efficiency measures reverts to the BAU profile. Note that these figures do not account for take-up as a result of supporting policy within the private rented sector.

Table 56 Energy savings from BAU policy and the additional savings from the non-domestic Green Deal.

Measure	Energy savings potential in 2012 (GWh)	Energy savings achieved under the BAU in 2020 (GWh)	Additional savings made under Green Deal in 2020 (GWh)
Compressed Air	7	4	0
Air conditioning	1,250	1,238	0
Programmable Thermostats	16,344	6,832	277
Thermostatic Radiator Valves	5,458	2,639	40
Flat roof insulation	5,411	1,001	82
Pitched roof insulation	3,627	697	55
SWI	23	8	0
CWI	760	211	7
Energy-saving lighting	3,428	2,038	60
Lighting timers	9,178	2,678	231
Motors	6	2	0
Double Glazing	146	94	1
HF Ballast (Lighting)	379	243	4

Customer Preferences for Bundle Types and the Green Deal

A decision tree is used to determine the process of moving towards a decision to take out a Green Deal. It considers the interaction between the market's participants – such as tenants and landlords – and attributes likelihoods of continuing towards a Green Deal at each major decision point they face. This gives a framework with which to model the take-up of the Green Deal when decisions are influenced at different points along this journey. Results from the Green Deal Business Survey¹⁵² inform the attitudes of tenants and owner-occupiers to energy efficiency in general, having an in-depth assessment and obtaining a quotation for work.

A summary of the results of this modelling is shown below.

Table 57 Results of consumer decision-making analysis during a single tenancy period (PRS) or during a 10-year period (Owner-occupier sector)

	% of landlords who...	% of tenants who...	% of owner-occupiers who...
Have an assessment	13.7%	9.1%	12.6%

¹⁵² A report on the Green Deal Business Survey can be found on the DECC website http://www.decc.gov.uk/en/content/cms/consultations/green_deal/green_deal.aspx

Obtain quotations for work	10.7%	3.2%	8.8%
Undertake energy-management	22.8%	23.0%	28.5%
Don't abate	79.1%	85.0%	52.6%
Self-finance their abatement	17.5%	8.7%	43.5%
Refer to their tenant/landlord	0.5%	4.9%	N/A
Take out a Green Deal	2.8%	1.3%	4.0%
Green-Deal-triggered (self-financed)	1.2%	0.5%	2.3%
Total Green Deal stimulus	4.1%	1.8%	6.2%

Producer cost-benefit analysis

Step 3 allows for a profile of Green Deal-driven installations to be produced, from which costs and benefits may be analysed. These follow Green Book guidance and include time-series valuations of carbon, energy, air quality, the costs of undertaking successful and unsuccessful assessments, the costs of finance, and hidden costs. Hidden costs are assumed to be an additional 20% of the capital costs for Green Deal measures, and are factored in to the costs to the consumers. It is assumed that these are not visible at the time of decision-making, and do not affect the rate of take-up of Green Deals. It is assumed that there are two assessments completed for every one successful Green Deal in the voluntary sector. The costs of these are assumed to be paid by the business having the assessment.

Non-Domestic Private Rented Sector Regulation Model

The impact of a supporting policy targeted at the PRS sector is modelled separately from the voluntary take-up of the Green Deal (see Annex B for details on the PRS regulation policy). This is because of three main factors:

- this policy is likely to require landlords to install energy-efficiency measures that meet the Golden Rule;
- this policy would affect a subset of the total stock of premises that can qualify for the Green Deal; and
- the mix of measures is likely to be different from those who voluntarily utilise the Green Deal, where there is no requirement to link the measures and a premises' EPC rating.

A working assumption to model this policy has been to apply it to all new tenancies taken out in premises with an EPC rating of F or G, the least energy efficient bands. It is further assumed that it would require these premises to undertake all the energy efficiency improvement measures compliant with the Golden Rule, which would improve their rating to E or better. Due to the strictness of the Golden Rule criterion, some buildings' physical constraints and the rate of turnover of leases, the model suggests that not all rented premises would achieve an E rating if this policy was fully bedded into the market.

The stages undertaken to estimate the figures are as follows:

Identifying Total Abatement to Move Band F&G-Rated Boilers to band E

This is based on analysis undertaken by the Carbon Trust¹⁵³, which identifies the average costs and savings that would be required and delivered for a typical building to move up from a specified EPC rating to another. Adjustments are made so that this analysis is consistent with The Green Book's¹⁵⁴ appraisal guidelines. Further adjustments are made to model just those buildings in bands G and F, and determine how much abatement they would require to move to band E.

Reduce to the Scope of PRS-Focused Supporting Policy

Several factors limit the deliverability of the energy efficiency opportunities initially identified. Achievement of the Golden Rule once finance has been taken into account; exemptions for listed buildings; the inability to get to an E EPC-rating with Green Deal-compliant measures; and other individual circumstances are each likely to affect the impact of such a policy. To account for these constraints, an 'undeliverability' factor has been applied (35%, 25%, and 15%) of the identified abatement potential for the Low, Central and High take-up scenarios respectively), and a consideration of the distribution of the cost-effectiveness of measures has been made.

The rate of non-compliance with any such potential regulation is likely to be higher in the non-domestic sector relative to the domestic sector. The primary reason for this is that there is greater uncertainty regarding future energy savings within a particular property. Successive tenants are often likely to engage in different activities within the building. As a result of this, the cost effectiveness of measures and the energy savings they will achieve are much less certain. This is in contrast to most properties in the domestic sector, where use of the property is likely to be more stable.

Account for BAU Uptake & Existing policy Coverage

N-DEEM and the analysis for the voluntary Green Deal take-up are used to assess the level of take-up of relevant measures being driven by existing policy or in the BAU. This is to avoid double counting and excess attribution to the regulation.

Fit PRS-Focused Supporting Policy Savings to Annual Profile

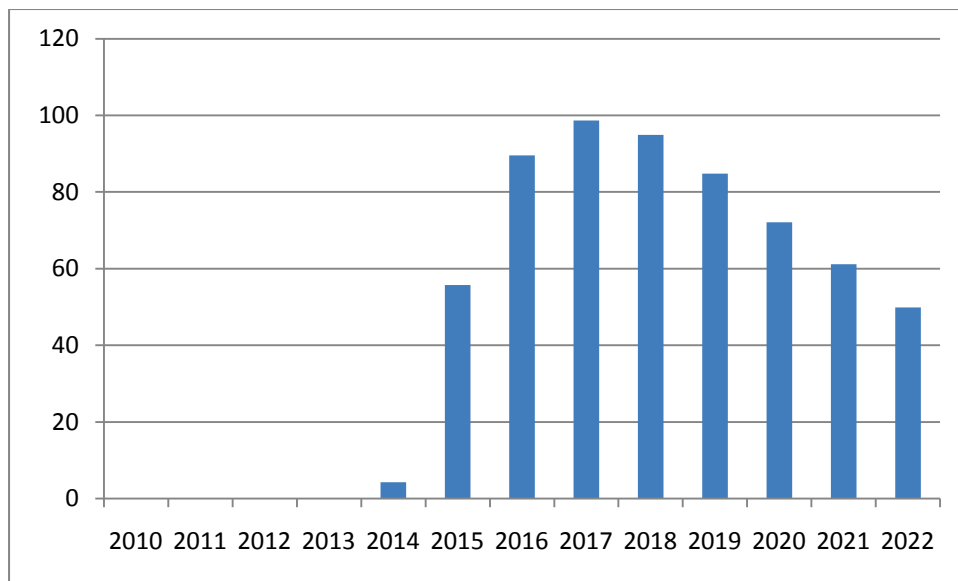
The aggregate savings derived from the supporting policy are applied to an annual profile of take-up, demonstrated for the central scenario in the chart below. This is dependent on the year of introduction of the policy, and also the average period of a lease. There is also expected to be some pre-compliance with the anticipated policy, as landlords anticipate its introduction.

¹⁵³ *Building the Future, Today*

<http://www.carbontrust.co.uk/Publications/pages/publicationdetail.aspx?id=CTC766>

¹⁵⁴ The Green Book, HM Treasury http://www.hm-treasury.gov.uk/data_greenbook_index.htm

Figure 38 Annual energy efficiency capital installations as a result of regulating the non-domestic rental sector (£m)



Producer Cost-Benefit Analysis

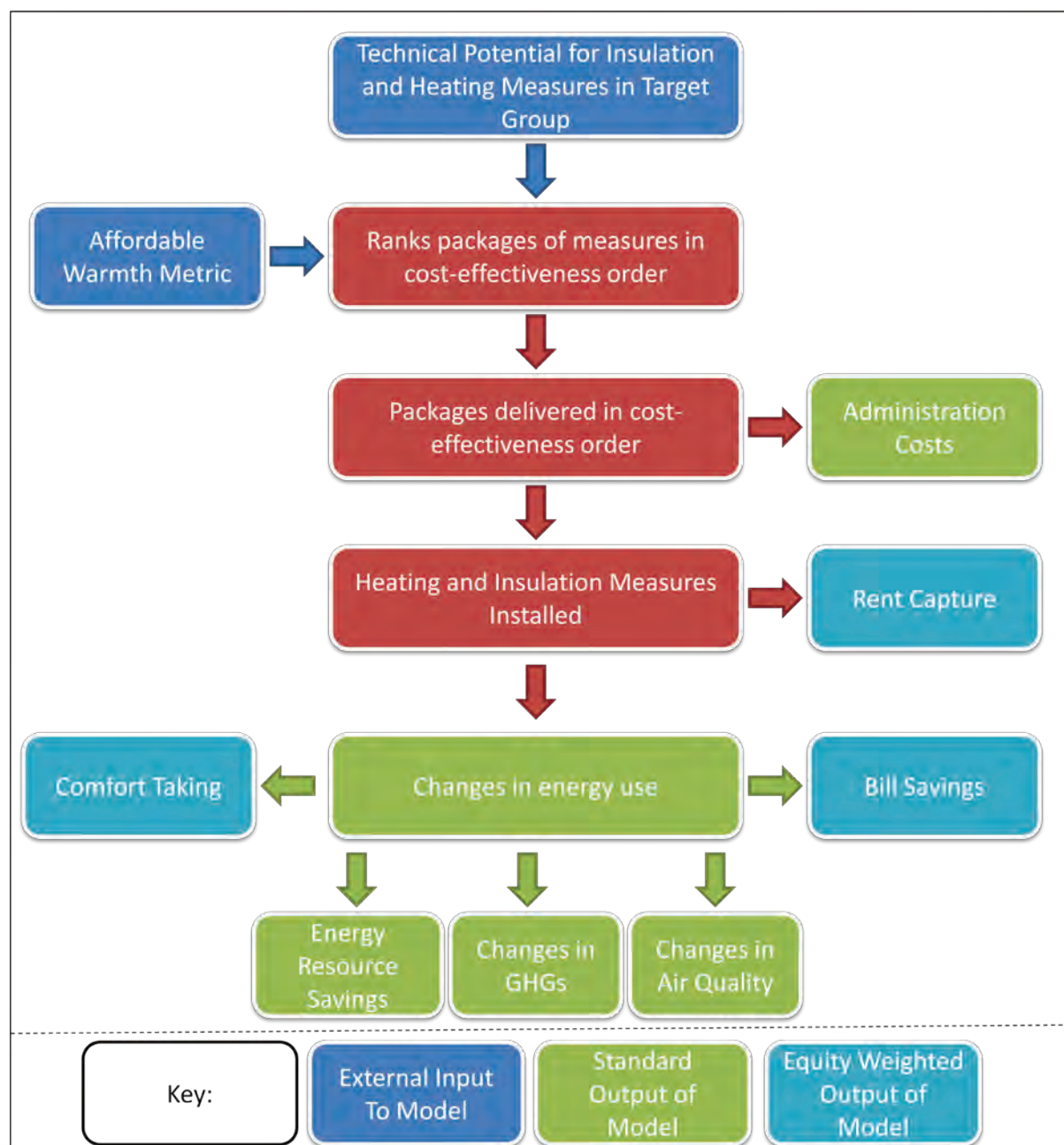
The annual profile of installation of measures allows a time-series of the relevant components to be created, from which net present costs and benefits are calculated.

Annex D: The Affordable Warmth Model

Summary of Overall Approach

The Affordable Warmth model simulates the delivery of measures that reduce the cost of heating homes for low income and vulnerable households. A summary of the modelling methodology applied in this Impact Assessment is shown below and set out in detail in this section. A summary of the changes in approach and input assumptions is also detailed below.

Figure 39 Summary of methodology for the Affordable Warmth Model (AWM)



The model firstly assesses the technical potential for installing a range of major insulation and heating measures in a specified target group of households, based on combined data from the English Housing Survey, Scottish House Condition Survey and the Living in Wales Survey. It then

estimates how each package of measures would score against the Affordable Warmth Metric (notional reductions in heating costs), and compares this to the cost of installing each package. This allows the cost-effectiveness of each package of measures to be compared on the basis of the cost per Affordable Warmth point achieved by the package. Packages are then ranked on this basis, based on the assumption that participating suppliers will seek to achieve the Affordable Warmth target at minimum cost.

The model then simulates the installation of packages of measures, in cost-effectiveness order, until the target has been met. This results in a number of heating and insulation measures being installed and the generation of some economic surplus. The measures installed lead to changes in energy consumption in the domestic sector, where households receiving measures reduce their overall energy consumption if insulation is installed, and typically change the type of energy they consume where a heating measure is installed. As both types of measures typically reduce the cost of heating, households may choose to take some the savings in costs as comfort by increasing the temperature they heat to (we term this 'comfort taking'). The overall changes in energy use result in energy bill savings, as well as reductions in energy use, greenhouse gas emissions and air quality.

Changes in Affordable Warmth Modelling Since the Consultation Impact Assessment

The Affordable Warmth modelling for this impact assessment includes changes to a small number of input assumptions (consistent with updates to the Green Deal Household Model outlined in Annex A), a change in modelling approach from delivery of single measures to packages of measures, and changes in final policy decisions.

Updated Input Assumptions

Changes to the input assumptions for the Affordable Warmth (AW) modelling include:

- Consistent with the Green Deal Household Model, an update has been applied to the share of technical potential to deliver cavity wall insulation that is 'easy-to-treat' and that is 'hard-to-treat'. The estimated number of easy-to-treat cavity walls compared to hard-to-treat is now higher, which results in a higher number of more cost-effective opportunities. This will mean that under the AW target the number of measures that can be delivered will increase, the total reduction in notional heating costs that can be achieved will increase, and the overall Net Present Value (NPV) of achieving the target will increase.
- The consultation stage Impact Assessment analysis had assumed that new and replacement heating systems would score against the AW target in terms of the reduction in *space heating costs only*. In line with final decisions around the methodology for scoring the AW target, we have increased the estimated notional savings from new and replacement heating systems as they will also affect the notional costs of water heating. This will slightly increase the relative cost-effectiveness of heating measures relative to insulation in meeting the AW target, and increase the scale of the AW target.
- Since the consultation Impact Assessment the anticipated costs of heating measures has been updated with the latest available data on the physical costs of installing new and replacement heating systems, based on past and current Government sponsored energy efficiency schemes.

These updated costs are typically lower than those used in the consultation Impact Assessment analysis. This results in the projected delivery of more measures under the AW target and will increase the NPV of achieving the target.

Updated Approach to Modelling Delivery of Measures

There has been one significant change to the overall modelling approach for AW measures. In the consultation Impact Assessment each measure was considered in isolation, and measures were delivered in cost-effectiveness order. This meant the most cost-effective measures were delivered first, and when the feasible potential for delivering that measure was exhausted, suppliers were assumed to move on to delivering the next most cost-effective measure.

The new approach taken reflects a delivery model more consistent with stakeholder views and observations from current and previous Government sponsored energy efficiency schemes. This approach identifies whether multiple opportunities to install measures in a single home exist (e.g. a home where a new heating system could be installed along with cavity wall insulation), and if so measures are packaged together (e.g. previously a new heating system and a cavity wall insulation installation would be treated separately, whereas we now package them together as 'heating system plus cavity wall insulation').¹⁵⁵ The most cost effective packages are then delivered first, with more expensive packages (e.g. solid wall insulation) only delivered if more cost-effective packages have been exhausted. This packages approach will slightly reduce the cost-effectiveness of the modelled mix of measure delivered, and therefore reduces the NPV of achieving the AW target.

Updates to reflect final policy decisions

The two main policy decisions that have had an impact on the AW modelling relate to:

- Eligibility. The preferred option in the consultation Impact Assessment in relation to proposed eligibility criteria for AW support was to combine the set of passport benefits that make up eligibility for the current CERT Super Priority Group (for private tenure households). The consultation also sought views on the possibility of extending this preferred option to include Working Tax Credit and potentially widening the age restrictions currently applied to the CERT Super Priority Group, and the Government is implementing this extension to the eligible group proposed in the consultation. This increases the size of the eligible group and therefore increases the scope for the delivery of cost-effective measures that score against the AW target. This results in an increase in the number of measures that can be delivered under the target and also increases the NPV.
- Allocating the ECO. The consultation requested views on whether the ECO should be allocated between participating suppliers on the basis of the number of customer accounts held by each supplier, or the volume of energy supplied. The consultation Impact Assessment assumed that

¹⁵⁵ We cannot be sure in which specific dwellings boilers will break, and therefore in which dwellings there will be opportunities to deliver insulation in combination with a boiler replacement. We therefore apply a probability-based calculation to estimate how many broken boiler replacements can be packaged together with insulation measures. For example, if in a single year 10% of eligible households have a broken boiler, and 5% have an unfilled cavity wall, the number of households with the opportunity to package together a boiler replacement and cavity wall insulation will be 10% x 5% x Total Size of Eligible Group.

the ECO would be allocated based on customer accounts, and potentially result in a 'per customer' pass through of costs to energy bills. Following majority support for a supply-based allocation in the consultation, the Government is allocating the ECO on the basis of kWh of gas and electricity supplied, with 50% of the obligation set based on the kWh supplied of each fuel. The modelling assumes that costs of the ECO are passed on in the way that they were allocated, therefore resulting in those households in lower income groups (who on average tend to consume relatively less energy) paying a smaller share of the costs of the obligation. This is a distributional issue, so does not alter the NPV of achieving the AW target, but does increase the equity-weighted NPV.

Technical Potential and Measure Delivery

The number of opportunities to deliver measures that result in reductions in notional heating costs in the target group is identified from the English Housing Survey, the Scottish House Condition Survey and the Living in Wales Survey. While any measure that would reduce the notional heating costs of a dwelling could be installed to meet the Affordable Warmth target, the modelling considers only the measures which generate the most significant reductions in notional energy use.¹⁵⁶ Over the lifetime of the ECO, the Green Deal, Carbon Saving Obligation and Carbon Saving Communities Obligation are expected to deliver a certain number of insulation measures to the Affordable Warmth eligible group. As such, the total technical potential deliverable by the Affordable Warmth obligation is reduced accordingly. Consistent with the Green Deal Household Model, adjustments are made to the technical potential to account for activity under the Carbon Emission Reduction Target (CERT) and Warm Front up to 2013.

A number of the technical potential measures may also not be feasible to deliver, a small number of households may be able to install measures independently, or similarly suppliers may not be able to identify all eligible households with opportunities. As such, and to account for this uncertainty, a 15 per cent reduction is applied for the technical feasibility of the measures.

Within the technical potential of measures for delivery under Affordable Warmth two broad types of measures are delivered: 1) stocks – where the potential to install measures does not change over time unless measures are installed (e.g. opportunities to install insulation); and 2) flows – where over time more opportunities become available (e.g. heating systems breaking over time).

- The technical potential *stocks* are reduced each year as Affordable Warmth installs insulation and new heating systems to households that previously had no heating system.
- As boilers break, this adds to the technical potential in the target group and as such comprises a *flow* of opportunities. The average lifetime of a boiler is twelve years. For the purposes of estimating the flow of broken boilers which need to be replaced, the model uses the *conservative* assumption that of the stock of boilers in the eligible group 1 in 14 will break each year.

We use the information on technical potential to build a supply curve for AW compliance. In theory, the lowest cost way of meeting a given target would be for suppliers to work their way up the supply

¹⁵⁶ Defined here as cavity wall insulation, loft insulation, new central heating systems, replacement heating systems, and solid wall insulation.

curve – i.e., delivering all of the lowest cost insulation measures before moving on to the next most cost-effective measure. However, in reality we would expect that where possible suppliers will want to deliver packages of measures whilst they have access to a property. As such the model assumes that measures are delivered as packages.

The model ranks all possible package combinations in cost effective order, with the package achieving an Affordable Warmth point (which will be defined in terms of reduction in notional space and water heating costs) at the lowest cost being delivered first. As such, the model predicts that some more expensive measures are installed where they are packaged in tandem with cheaper complementary measures.¹⁵⁷ The supply curve is recalculated each year as measures are installed, therefore reducing the stock of opportunities, and the flow of technical potential in the eligible group changes.

Supplier and Customer Costs

Costs borne by the *supplier* are modelled in two parts; the cost of delivering the measures and the costs of administering the scheme.

- *Delivery costs* comprise of the initial household survey, material and labour to install the measure, and a follow up inspection. Costs for the survey and follow up inspection are assumed to be similar to that of other government backed schemes of comparable scope and scale. Direct costs of installing each measure (labour and material) are consistent with the Green Deal Housing Model (and call for evidence that informs its assumptions) and modelling of other government schemes as appropriate.
- *Administration costs* to the supplier are separated into two parts; fixed and variable (see section on 'One In, One Out' for more detail on calculations of administration costs).
 - The *fixed costs* account for the cost of setting up and running the scheme, these include an assumed cost of personnel resource estimated at appropriate FTE values.
 - The *variable costs* include an additional cost per measure installed; The model assumes that households receiving measures through the scheme will require at least one phone call to an energy supplier and 30% of the measures will require a follow up call.

The *customer* will also face direct costs associated with the installation of any measure, such as redecoration, loft clearance and time spent supervising the work. These costs are described as hidden costs and adapted from the ECOFYS report of domestic energy¹⁵⁸. These are equity weighted (where appropriate) to represent the higher relative costs that households in the lower income groups face .

Costs to Energy Consumers

It is expected that the suppliers will pass on the costs of ECO Affordable Warmth to consumers on the same basis on which it is levied. The decision has been taken to allocate the ECO on the basis of

¹⁵⁷ For example, a package of new central heating combined with hard-to-treat cavity wall insulation will be more cost-effective than hard-to-treat insulation on its own.

¹⁵⁸ ECOFYS (2009). *The Hidden Costs and Benefits of Domestic Energy Efficiency and Carbon Saving measures*. Available at:

http://www.decc.gov.uk/assets/decc/what%20we%20do/supporting%20consumers/saving_energy/analysis/1_20100111103046_e_@@_ecofyshiddencostandbenefitsdefrafinaldec2009.pdf

units (kWh) of energy supplied, with half of the obligation allocated on units of electricity supplied and the other half on units of gas supplied (see Annex H for more detail). As such, the costs of the policy are assumed to be distributed as a fixed addition to the price per unit of metered fuel (electricity and/or gas) consumed by a household, therefore higher energy consumers – which typically tend to be relatively wealthier households – paying a greater share of the costs than low energy users – which typically tend to be lower income households.¹⁵⁹

Affordable Warmth Public and Private Benefits

There are a number of benefits from the installation of energy efficiency measures. These include; comfort taking, savings on energy bills (and their wider social value), changes in greenhouse gas emissions, air quality and demand for energy.

Comfort taking, reflects the increase in temperature in households where measures are installed. Where measures installed reduce the cost of heating to a certain temperature level, households may choose to use some of this saving to increase warmth levels in their home.¹⁶⁰ This additional warmth, while lowering the reduction in energy costs experienced by the household, has a benefit in terms of additional comfort. The positive welfare impact of the increased temperatures (and therefore energy usage) is valued using retail energy prices from the Interdepartmental Analyst Group (IAG) guidance on valuing energy and greenhouse gas emissions.¹⁶¹ The Warm Front Study Group report (Green and Gilbertson, 2008) showed a significant behavioural effect of the installation of energy efficiency measures in terms of increased internal temperatures in the home. This reduces the energy consumption benefits (such as reduced GHG emissions) from the measures, but also has a social and private value in itself. Heating and insulation measures are treated differently to ensure the figures align as best as possible with observed behaviour. Comfort taking in relation to insulation measures is 15% of the full saving, consistent with the evidence underpinning the Green Deal Household Model assumptions. The comfort taking that results from heating measures takes the difference in kWh usage between that used to heat the home to 18°C before measures and 19°C afterwards and values that difference using the retail prices for the appropriate fuel. This is based on the findings of the Warm Front Study Group report, which found that on average low income and vulnerable households tended to heat their living rooms to 17.9°C before heating and insulation measures were installed and 19.6°C afterwards.¹⁶² To recognise the social value of the increased temperatures experienced by lower income households, we apply equity-weights to the comfort taking values when considering equity-weighted Net Present Value calculations (see Equity Weighting section for more detail).

Energy savings resulting from the installation of energy efficiency measures provide a society benefit in terms of a reduction in the demand for metered fuels and power generation. In line with the IAG guidance, this benefit is valued at the variable price for each unit of energy saved.

¹⁵⁹ See White, Roberts and Preston (2010). *Understanding 'High Use, Low Income' Energy Consumers*. Available at: http://www.cse.org.uk/downloads/file/understanding_high_use_low_income_energy_consumers.pdf

¹⁶⁰ For evidence of comfort taking in previous Government energy efficiency schemes see Green and Gilbertson (2008). *Warm Front Better Health*, available at: <http://www.apfo.org.uk/resource/view.aspx?RID=53281>

¹⁶¹ Available at:

http://www.decc.gov.uk/en/content/cms/about/ec_social_res/iag_guidance/iag_guidance.aspx

¹⁶² Green and Gilbertson (2008, p. 9). Available at: <http://www.apfo.org.uk/resource/view.aspx?RID=53281>

Changes in demand for energy as a result of the ECO Affordable Warmth mechanism changes the amount of *greenhouse gas emissions* from the domestic energy sector. This is a significant public benefit and therefore captured by the Affordable Warmth model. IAG GHG emission factors for each fuel type are applied to the aggregate kWh changes in the consumption of the fuels. The model differentiates, for valuation purposes, between traded and non-traded greenhouse gas emissions. The changes in emissions from electricity are valued at the EU ETS price for traded carbon and from all other fuels at the DECC non-traded carbon price.

Changes in *air quality* are caused by changes in energy demand (and therefore burning of metered fuels or power generation). Air quality changes are valued using the air quality damage factors relevant for each emission source from the IAG guidance.

The installation of energy efficiency measures result in an *energy bill saving* over the lifetime of the measure. The level of bill saving will vary depending on household type and characteristics which is getting the measure(s). It will also depend on the lifetime of the measures, see below. This saving is a private benefit, in terms of the monetary saving to the household, which does not in itself have a social value therefore we do not capture it. There is, however, a social value attached to reductions in energy bills for low income and vulnerable households, which we do capture when considering equity-weighted Net Present Value calculations. We capture the social value of these savings by taking the difference between equity-weighted and unweighted bill savings (i.e. social value = [equity-weighted bill savings] – [unweighted bill savings]).

Measure Lifetimes

Benefits vary between each measure and package installed based on both the effectiveness of the measure and the expected lifetime of the measure. The table below shows the assumed lifetime saving used in the AW model, which are consistent with those applied in the Green Deal Household Model.

Table 58 Summary of assumed measure lifetimes used in the Affordable Warmth Model (AWM)

Measure	Assumed Lifetime
Loft Insulation	42 years
Cavity Wall Insulation	42 years
Solid Wall Insulation	36 years
Central Heating	12 years
Minor Measures	4 to 10 years

Economic Surplus

The delivery mechanism of the ECO Affordable Warmth is via energy suppliers. As described above, packages of measures will be delivered until the Affordable Warmth target is met. The cost of a unit of Affordable Warmth compliance will be set by the interaction of the supply and demand curve (i.e. by the marginal cost of the last unit of compliance). As such, some intra-marginal economic “rent”,

or “additional subsidy” will be generated on the lower cost units of compliance¹⁶³. This is captured in the Affordable Warmth model. This rent could be captured by the energy supplier, the installer or the household. In the absence of any evidence, we have made the conservative assumption for the purpose of the cost to business estimates that this rent is fully captured by householders receiving the measures.

Counterfactual Heating

In order to assess the effect of installing measures in households it is necessary to estimate what households would do in the absence of the intervention. When considering the installation of heating measures, the *counterfactual heating* assumption is that 60% of households receiving a new or replacement heating system will be using secondary electric plug in heating, and 40% will be using either secondary gas heaters or an intermittent (not fully functioning) gas boiler.¹⁶⁴ As such, all changes in energy use and emissions are based on the movement away from a mixture of plug in electric heating and secondary/intermittent gas heating. Insulation only benefits are calculated using the saving where the household has a functioning central heating system. Heating and insulation package benefits are calculated assuming that the saving of heating and insulation encompass the move from secondary heating to central heating first, and the additional saving from insulation once the household has a fully functioning central heating system.

Discounting

Discounting the costs and benefits associated with the obligation is undertaken in line with *Green Book* methodology of 3.5% for the first 30 years of costs/benefits and 3% for any costs/benefits after that (e.g. loft insulation bill savings are assumed to last 42 years).

Equity Weighting

In line with *Green Book* methodology, the Affordable Warmth Model uses equity weighting to produce an additional NPV figure that reflects the distributional outcome of the policy under consideration. The use of equity weights provides a means of valuing the impacts of the policy on different households through accounting for the differences in value that individuals at different points in the income distribution place on a £1 loss or gain.

The weights are calculated by dividing the marginal utility of consumption of the income group by the average marginal utility of consumption of the population. The marginal utility of consumption for each income group is calculated by dividing 1 by the average income of that group. The weights used in the modelling are shown below (the average income data is based on the EHS).

¹⁶³ This is referred to as “additional subsidy” the ECO mechanism costs section of the main body of the IA. See Annex H for further explanation.

¹⁶⁴ This is based on actual observations from similar previous Government backed schemes.

Table 59 Equity weights used in equity-weighted NPV calculations

Unequalised Income Decile Group	Average Unequalised Income (2009)	Marginal Utility of Consumption	Equity Weight
1	£7,257	0.00014	3.84
2	£11,112	0.00009	2.51
3	£13,992	0.00007	1.99
4	£17,089	0.00006	1.63
5	£20,718	0.00005	1.34
6	£24,827	0.00004	1.12
7	£29,619	0.00003	0.94
8	£35,679	0.00003	0.78
9	£44,438	0.00002	0.63
10	£73,770	0.00001	0.38
Average Income:	£27,851	4.00E-05	

Annex E: Estimating Employment Impacts

This section estimates the gross number of jobs created or sustained as a direct consequence of the policy package. It makes no attempt to calculate the net employment impact. As such, increases in the number of people employed in the insulation sector do not necessarily reflect increase in employment within the economy as a whole as workers will move between sectors. Also, the numbers do not take account of substitution within the labour market. Our estimates suggest that between 38-60,000 jobs would be supported by the uptake of the measures expected by this policy, broken down as follows.

Number of Installers

The estimate of the number of installers required is based on the number of measures installed each year. These are multiplied by the assumed productivity for each installation (man days to complete a job) set out in the Aggregate Impacts section of the main text. These estimates of productivity are based on discussions with the industry. It is assumed that an installer works 220 days a year and a full time equivalent (FTE) installer is making installations 80% of the time. In 2015, the estimated total number of installers required to deliver the number of installations is 9,800, up from around 4,700 in 2007/8.

Number of Supply Chain Jobs

Two estimates of the number of supply chain jobs were made. The first is based on a 2009 Innovas report¹⁶⁵ which details the current number of jobs in different low carbon business sectors. This report estimated that the ratio between installer numbers and supply chain jobs (manufacturing, supply, distribution, development) was 1 : 4.75 (i.e. there was 4.75 jobs in the supply chain for each installer job created). This ratio was used to provide the upper estimate of 46,000 supply chain jobs that would be supported by the policy. There are a number of reasons why this may be an over estimate. For example, an increase in number of installers in the sector may not lead to proportional rise in the number of distributors. On the other hand the Green Deal provider will also provide employment opportunities which will increase the number of jobs supported in the sector.

The lower estimate was produced by comparing the total capital spending in the sector with the labour to capital spending ratio estimate by Construction Skills (the Sector Skills Council for construction). The ratio of job to capital spending for housing repair and maintenance is 32.6 jobs per £1m output. A total capital investment in 2015 of around £1.08bn would give a number of insulation sector jobs supported of around 35,000 (including installers, meaning supply chain jobs would be around 25,000).

Number of Assessors

The number of assessor has been estimated using the assumption that an assessor will conduct an average of 2 assessments per day and that there will be 3 assessments for every successful Green Deal (this conversion rate is based on the assumption that the pre-assessment process screens

¹⁶⁵ *Low Carbon Good and Services: an industry analysis*, Innovas, 2009
<http://www.bis.gov.uk/files/file50253.pdf>

household for suitable customers). Based on these assumption in 2015 there will be 1.2m assessment that will provide employment for 3,500 FTE assessors.

Annex F: Additional Analytical Results

Domestic Sector Scenarios and Sensitivities

Table 60 Domestic Sector sensitivities (1)

	Central Scenario	Low Uptake	High Uptake	High energy prices	Low energy prices	High interest rates	Low interest rates	High SWI learning rates	Low SWI learning rates
NPV (net BAU)	8,305	6,252	8,977	11,891	4,050	8,339	8,228	8,331	8,312
Carbon saving (pa at Mar 2015)	0.38	0.32	0.38	0.42	0.29	0.36	0.38	0.37	0.38
Carbon saving (pa in 2022)	1.43	0.83	1.72	1.87	0.91	1.35	1.47	1.46	1.40
CWI Uptake 2013	398,000	378,100	386,400	418,900	332,000	397,500	390,900	395,700	398,200
2014	345,800	291,300	339,500	358,700	267,200	341,000	343,200	342,700	346,200
2015	345,000	278,200	341,500	358,100	272,800	340,300	344,100	343,100	345,100
2016	296,300	211,900	315,900	324,000	208,200	287,500	297,100	293,900	300,800
2017	276,600	185,800	286,000	320,200	204,200	265,100	279,300	275,200	277,300
2018	244,200	163,700	253,900	295,100	194,200	238,100	247,900	244,200	245,100
2019	218,100	145,400	219,100	261,100	188,300	213,000	222,600	216,600	219,500
2020	205,700	123,600	209,500	243,700	167,700	200,300	210,700	204,800	206,800
2021	193,200	108,300	204,000	229,200	160,400	187,100	197,800	194,600	194,600
2022	178,900	101,100	188,900	217,900	159,100	173,400	186,300	179,800	184,100
Total	2,701,800	1,987,300	2,744,800	3,026,700	2,154,100	2,643,300	2,720,000	2,690,500	2,717,700
SWI Uptake 2013	41,800	48,300	50,400	36,300	60,600	32,800	43,000	41,600	41,800
2014	79,200	82,700	92,000	73,500	108,400	72,900	84,700	79,100	78,800
2015	102,400	112,300	114,300	100,500	136,500	100,500	107,100	106,700	101,000
2016	105,100	80,400	133,400	108,500	80,600	95,200	110,100	105,800	103,700
2017	106,800	89,000	138,900	124,300	88,900	99,600	115,600	114,100	106,000
2018	101,800	79,200	138,400	118,000	77,400	95,300	109,600	104,500	92,900
2019	91,500	69,800	122,800	114,500	65,700	83,800	98,100	99,700	89,300
2020	99,100	90,800	139,100	115,600	80,700	92,600	99,200	103,700	96,900
2021	105,000	95,800	146,900	135,800	83,800	102,300	109,000	113,600	97,700
2022	124,400	101,800	163,700	146,200	91,300	112,200	122,700	126,900	108,300
Total	957,000	850,200	1,239,900	1,073,100	874,000	887,200	999,100	995,800	916,500
Loft Uptake Total	1,636,600	1,262,600	1,708,500	1,810,100	1,395,600	1,600,500	1,649,100	1,631,100	1,642,100

Table 61 Domestic Sector sensitivities (2)

	Central Scenario	High SWI energy savings	Low SWI energy savings	High assessment costs	Minimum 25% bill saving	Rising SWI DMF	Falling DMF	Strong LA action
NPV (net BAU)	8,305	8,816	7,919	7,857	7,802	8,555	7,045	8,672
Carbon saving (pa at Mar 2015)	0.38	0.37	0.38	0.36	0.33	0.37	0.38	0.38
Carbon saving (pa in 2022)	1.43	1.57	1.31	1.36	1.11	1.48	1.21	1.58
CWI Uptake 2013	398,000	366,100	422,600	386,400	371,900	393,200	412,900	390,300
2014	345,800	319,300	369,500	328,700	318,800	345,600	336,500	341,600
2015	345,000	324,600	364,700	328,200	317,000	340,400	323,900	341,900
2016	296,300	289,400	308,100	283,300	252,400	294,400	271,500	315,000
2017	276,600	265,400	281,000	253,700	232,000	270,600	238,700	288,400
2018	244,200	238,000	245,300	231,600	211,100	242,000	200,900	257,400
2019	218,100	213,100	220,800	205,700	193,100	206,500	175,700	231,200
2020	205,700	207,400	204,900	202,500	177,200	199,100	154,500	217,400
2021	193,200	198,500	190,700	188,600	165,100	191,700	134,700	204,500
2022	178,900	185,900	190,400	177,000	158,900	178,600	127,400	193,900
Total	2,701,800	2,607,700	2,798,100	2,585,600	2,397,600	2,662,100	2,376,800	2,781,500
SWI Uptake 2013	41,800	47,500	35,000	42,000	46,300	40,700	43,600	48,700
2014	79,200	84,900	74,200	81,200	80,600	79,400	82,900	86,600
2015	102,400	109,800	94,900	101,300	111,800	103,900	108,300	109,100
2016	105,100	115,400	94,200	103,400	86,200	106,700	105,700	117,900
2017	106,800	127,100	97,000	106,600	89,700	111,600	114,300	127,700
2018	101,800	113,500	85,400	99,500	81,900	108,100	109,400	115,600
2019	91,500	101,300	80,500	91,600	74,400	94,400	102,100	105,800
2020	99,100	106,300	89,300	98,000	87,900	107,900	104,900	120,800
2021	105,000	115,700	102,600	103,400	89,400	113,600	108,100	123,700
2022	124,400	124,400	110,000	114,200	101,000	133,000	119,800	134,800
Total	957,000	1,045,800	863,200	941,200	849,100	999,400	999,100	1,090,700
Loft Uptake Total	1,636,600	1,600,100	1,660,100	1,538,800	1,472,900	1,633,900	1,503,600	1,692,300

Table 62 Uptake of installation measures subsidised by ECO / financed through Green Deal only in the Carbon Saving Communities group, Non-Carbon Saving Communities group, and the Affordable Warmth group, by year

	CSC Group				Non-CSC Group				Affordable Warmth			
	SWI (ECO)	CWI (ECO)	CWI (GD)	Loft alone top-up (ECO)	SWI (ECO)	CWI (ECO)	CWI (GD)	Loft alone top-up (GD)	SWI (ECO)	CWI (ECO)	CWI (GD)	Loft alone top-up (ECO)
2013	12,001	77,606		10,123	29,787	169,374	78,445	3,579	-	72,553		38,544
2014	20,036	83,423		14,952	59,144	164,555	89,012	4,161	-	8,819		43,048
2015	28,136	81,649		15,852	74,217	156,615	88,987	5,083	-	17,758		32,873
2016	27,974	69,565		9,867	77,148	125,174	86,791	6,912	-	14,786		105,167
2017	26,729	68,782		14,234	80,050	116,852	79,173	6,926	-	11,798		126,254
2018	28,047	61,773		13,149	73,771	105,078	65,523	5,812	-	11,798		104,323
2019	26,504	55,398		11,852	64,999	90,123	60,750	5,442	-	11,798		37,349
2020	25,122	51,454		15,496	74,007	86,266	56,175	4,972	-	11,798		40,799
2021	23,395	47,719		17,022	81,613	79,977	53,747	4,598	-	11,798		31,159
2022	35,685	43,572		31,325	87,537	74,146	49,396	4,169	1,143	11,798		32,302

Note: Loft insulation included in this table are those done independently, and do not include lofts installed alongside wall insulation.

Table 63 Uptake of installation measures by year

	SWI Internal	SWI External	CWI Easy-to-treat	CWI Hard-to-treat Unidentifiable	CWI Hard-to-treat Identifiable	LI top-up packaged with SWI	LI top-up packaged with CWI	LI top-up alone	Draught proofing and glazing	Floor insulation with SWI
2013	31,342	10,445	201,054	4,573	192,351	9,193	91,133	52,245	20,717	6,059
2014	64,761	14,419	146,167	5,635	194,006	17,420	91,591	62,162	24,931	12,234
2015	82,398	19,955	145,258	5,817	193,934	22,518	86,430	53,808	26,621	15,630
2016	85,344	19,779	138,174	5,312	152,830	23,127	72,702	121,947	24,376	16,153

	SWI Internal	SWI External	CWI Easy- to-treat	CWI Hard- to-treat Unidentifiable	CWI Hard- to-treat Identifiable	LI top-up packaged with SWI	LI top-up packaged with CWI	LI top-up alone	Draught proofing and glazing	Floor insulation with SWI
2017	84,950	21,830	127,125	5,222	144,259	23,491	65,706	147,413	23,908	16,164
2018	79,783	22,036	109,185	4,567	130,420	22,400	55,555	123,283	21,730	15,242
2019	70,278	21,225	100,756	4,216	113,097	20,131	48,226	54,642	19,413	13,499
2020	72,520	26,609	93,344	3,978	108,372	21,808	43,453	61,267	19,640	14,118
2021	73,192	31,816	87,015	4,023	102,204	23,102	39,035	52,780	19,604	14,447
2022	88,366	36,000	78,475	3,831	96,606	27,109	35,156	67,796	21,220	17,140
Total	732,932	224,114	1,226,554	47,173	1,428,079	210,299	628,987	797,344	222,163	140,687

Table 64 Uptake of installation measures by tenure, by year

	Social Housing Sector				Private Rental Sector				Owner Occupied Sector				(all tenures)	
	SWI	CWI	LI top- up packag ed with SWI / CWI	LI top- up alone	SWI	CWI	LI top- up packag ed with SWI / CWI	LI top- up alone	SWI	CWI	LI top- up packag ed with SWI / CWI	LI top- up alone	Afford able Warmt h SWI	Afford able Warmt h CWI
2013	25,597	77,833	16,071	6,466	9,355	25,471	10,303	939	6,835	222,121	73,952	6,297	-	72,553
2014	31,279	82,563	17,023	8,991	37,514	38,599	21,494	2,517	10,386	215,827	70,494	7,607	-	8,819
2015	36,236	82,150	17,496	9,180	51,579	44,236	26,693	3,260	14,537	200,865	64,758	8,496	-	17,758
2016	33,338	70,385	16,004	6,255	57,908	43,231	27,774	3,788	13,877	167,913	52,051	6,737	-	14,786
2017	31,111	71,438	14,833	8,775	57,307	42,074	27,304	4,108	18,362	151,295	47,060	8,277	-	11,798
2018	36,455	63,058	15,449	8,048	42,687	34,764	21,029	3,044	22,676	134,552	41,478	7,869	-	11,798
2019	34,693	55,468	14,380	7,081	32,271	29,032	16,520	2,459	24,538	121,772	37,457	7,753	-	11,798

	Social Housing Sector				Private Rental Sector				Owner Occupied Sector				(all tenures)	
	SWI	CWI	LI top-up packaged with SWI / CWI	LI top-up alone	SWI	CWI	LI top-up packaged with SWI / CWI	LI top-up alone	SWI	CWI	LI top-up packaged with SWI / CWI	LI top-up alone	Affordable Warmth h SWI	Affordable Warmth h CWI
2020	42,840	49,252	15,380	10,053	24,304	26,036	13,283	2,041	31,986	118,608	36,599	8,375	-	11,798
2021	47,461	45,922	15,517	11,505	18,532	23,396	10,878	1,748	39,016	112,125	35,743	8,367	-	11,798
2022	63,124	39,268	17,964	23,780	14,428	21,996	9,044	1,727	45,670	105,849	35,257	9,987	1,143	11,798

Table 65 Uptake of installation measures by group, by year

	Affordable Warmth Eligible Group				Non-Affordable Warmth Eligible Group			
	SWI	CWI	LI top-up packaged with SWI / CWI	LI top-up alone	SWI	CWI	LI top-up packaged with SWI / CWI	LI top-up alone
2013	11,304	122,213	12,823	43,179	30,483	275,764	87,503	9,067
2014	17,432	62,893	15,098	50,201	61,748	282,916	93,913	11,961
2015	21,895	72,464	16,276	40,703	80,458	272,545	92,672	13,105
2016	21,439	62,779	15,135	110,801	83,683	233,537	80,694	11,146
2017	20,516	60,018	14,597	134,359	86,263	216,588	74,600	13,054
2018	21,911	54,958	14,073	111,567	79,907	189,214	63,883	11,717
2019	20,194	50,414	12,855	43,805	71,308	167,656	55,502	10,838
2020	22,467	47,152	12,681	48,749	76,662	158,542	52,581	12,519
2021	23,428	45,439	12,245	39,423	81,581	147,803	49,892	13,357
2022	32,516	42,055	13,278	49,586	91,850	136,857	48,986	18,210

Non-Domestic Sector Scenarios and Sensitivities

The sensitivities presented in these tables concern the real interest rate charged on Green Deal Finance, together with variations around carbon valuations and energy price projections. In addition, there is an analysis of the sensitivity regarding assumptions of take-up probabilities for the Green Deal, and also around the proportion of the potential savings that are undeliverable in the PRS.

The tables below show the non-domestic element of the estimated impacts of the Green Deal and the supporting policy in the PRS. The central scenario corresponds to the impacts presented in the Aggregate Impacts section. Specific sensitivities to the assumptions underlying the central scenario are also included.

Table 66 Impact of the Green Deal in the non-domestic sector

		LOW scenario	CENTRAL scenario	HIGH scenario
Costs (£m)	Installation costs	-£28	-£78	-£154
	Hidden costs	-£6	-£16	-£178
	Assessment costs	-£126	-£126	-£124
	Finance costs	-£16	-£26	-£42
	Total costs (£m)	-£176	-£246	-£499
Benefits (£m)	Energy savings (Variable element)	£262	£501	£877
	Air quality benefits	£4	£7	£13
	Lifetime non-traded carbon savings	£14	£29	£53
	Lifetime EU Allowance savings	£15	£24	£38
	Total benefits (£m)	£294	£561	£981
Total (£m)	Net Present Value (£m)	£119	£315	£482
Carbon savings	2020 Non-traded carbon savings (MtCO ₂ pa)	0.04	0.08	0.14
	2020 Traded carbon savings (MtCO ₂ pa)	0.09	0.15	0.24
	Life time non-traded carbon savings	0.28	0.59	1.07

Table 67 Impact of potential supporting policy in the non-domestic sector

	PRS	LOW scenario	CENTRAL scenario	HIGH scenario
Costs (£m)	Installation costs	-£486	-£584	-£676
	Additional costs	-£97	-£117	-£135
	Assessment costs	-£37	-£45	-£52
	Finance costs	-£67	-£106	-£260
	Total costs (£m)	-£688	-£851	-£1,123
Benefits (£m)	Energy savings (Variable element)	£784	£954	£1,110

	Air quality benefits	£29	£35	£41
	Lifetime non-traded carbon savings	£306	£373	£434
	Lifetime EU Allowance savings	£161	£196	£229
	Total benefits (£m)	£1,280	£1,558	£1,814
Total (£m)	Net Present Value (£m)	£592	£708	£691
Carbon savings	2020 Non-traded carbon savings (MtCO ₂ pa)	0.69	0.83	0.97
	2020 Traded carbon savings (MtCO ₂ pa)	0.65	0.79	0.92
	Life time non-traded carbon savings (MtCO ₂)	6.48	7.90	9.20

Table 68 Sensitivities within the non-domestic Green Deal analysis

		Low energy prices	High energy prices	5% real interest rate	12% real interest rate	Low assessment probability ¹⁶⁶	High assessment probability
Costs (£m)	Installation costs	-£94	-£94	-£103	-£85	-£48	-£138
	Additional costs	-£19	-£19	-£21	-£17	-£10	-£28
	Assessment costs	-£63	-£63	-£63	-£63	-£40	-£124
	Finance costs	-£26	-£26	-£17	-£39	-£14	-£33
	Total costs (£m)	-£202	-£202	-£204	-£204	-£111	-£322
Benefits (£m)	Energy savings (Variable element)	£376	£563	£563	£473	£476	£745
	Air quality benefits	£7	£7	£8	£7	£8	£11
	Lifetime non-traded carbon savings	£29	£29	£33	£28	£38	£43
	Lifetime EU Allowance savings	£24	£24	£25	£23	£33	£36
	Total benefits (£m)	£436	£623	£629	£530	£555	£835
Total (£m)	Net Present Value (£m)	£234	£421	£425	£327	£443	£513
Carbon savings	2020 Non-traded carbon savings (MtCO ₂ pa)	0.08	0.08	0.08	0.08	0.03	0.12
	2020 Traded carbon savings (MtCO ₂ pa)	0.15	0.15	0.15	0.15	0.06	0.23
	Life time non-traded carbon savings (MtCO ₂)	0.59	0.59	0.57	0.55	0.81	0.90

¹⁶⁶ In the central scenario, the proportions of agents taking out an assessment are 13.7%, 9.1%, and 12.6% of landlords, tenants and owner-occupiers respectively. For the low probability sensitivity, these probabilities are 5%, 0.5% and 5% respectively. For the high probability sensitivity, these are 20%, 2.5%, and 20%.

Table 69 Sensitivities within the analysis of the potential supporting policy in the non-domestic sector

		Low energy prices	High energy prices	5% real interest rate	12% real interest rate	15% undeliverability ¹⁶⁷	33% undeliverability
Costs (£m)	Installation costs	-£584	-£584	-£563	-£564	-£488	-£680
	Additional costs	-£117	-£117	-£113	-£113	-£98	-£136
	Assessment costs	-£45	-£45	-£43	-£43	-£37	-£52
	Finance costs	-£106	-£106	-£62	-£158	-£87	-£124
	Total costs (£m)	-£851	-£851	-£781	-£878	-£710	-£992
Benefits (£m)	Energy savings (Variable element)	£897	£1,005	£921	£922	£790	£1,117
	Air quality benefits	£35	£35	£34	£34	£29	£41
	Lifetime non-traded carbon savings	£373	£373	£360	£361	£309	£437
	Lifetime EU Allowance savings	£196	£196	£190	£190	£162	£231
	Total benefits (£m)	£1,502	£1,609	£1,504	£1,506	£1,291	£1,826
Total (£m)	Net Present Value (£m)	£651	£758	£723	£628	£581	£834
Carbon savings	2020 Non-traded carbon savings (MtCO ₂ pa)	0.83	0.83	0.83	0.83	0.69	0.98
	2020 Traded carbon savings (MtCO ₂ pa)	0.79	0.79	0.79	0.79	0.65	0.93
	Lifetime non-traded carbon savings (MtCO ₂)	7.9	7.9	7.9	7.9	6.5	9.3

¹⁶⁷ The undeliverability factor specifies the proportion of the potential savings that are not achievable through the potential supporting policy in the PRS. In the central scenario, this proportion is 25%.

Annex G: Green Deal Mechanism Decisions

This annex reviews policies that have undergone material change since launch of the consultation. The following sections discuss our original position, the evidence and rationale that led to a revision of our initial policy preference, and the outcome of our review.

Assessments

Our modelling of Green Deal take-up for the Consultation Stage Impact Assessment was based on the assumption that householders would be billed for the cost of assessments and this cost would be rolled into their funding requirement. In this way, they would not make a cash payment since the cost of the assessment would be factored into the Golden Rule calculation. Likewise, those householders who would not come forward to take up a Green Deal plan would be billed direct, so that the cost of failed assessments would not be socialised across successful assessments and in this way add to the overall cost of Green Deal delivery.

Following consultation responses and feedback from stakeholders we amended this approach – hence the sensitivity analyses listed below. Many consultation responses argued that full upfront payment from consumers in all cases is an unlikely model for delivery as it will restrict take-up among many consumers who may have been interested in the Green Deal where this cost was reduced or absent. Clearly a free assessment would mean that the overall social cost of assessments is determined by the conversion rate: the ratio of successful to unsuccessful assessments. Our estimate for this remains one in three based on available evidence¹⁶⁸.

However, free assessments for the consumer may be unlikely. There are several reasons for this. Firstly, research has often shown that consumers do not value a completely free assessment. Secondly, consumers might commission a Green Deal assessment without any intention to pursue a Green Deal, as a way to fulfil their EPC obligations without paying. Finally, any provider offering completely free assessments would have to roll the entire cost of failed assessments into their installation cost, making them liable to being undercut by a rival provider that did charge.

As such, we expect a range of likely market offers to be presented to the consumer, from a partial upfront payment to the model whereby the assessment cost is either partly or fully subsidised or else added to the Green Deal Plan.

The central scenario is based on the assumption that the cost of two failed assessments (2 x £112.50 = £225) is rolled into the cost of the measure with the remainder of the cost being recovered from households upfront in cases where a Green Deal is not taken up.

¹⁶⁸ We acknowledge that this ratio may require revision once the Green Deal market has come into being. Empirical findings that guide our assumed conversion rate include results from the Sutton pilot where the conversion rate was above 50%. A voluntary programme in Canada has reported a take-up rate of over 70%. The PAYS Pilot scheme found that some 60% of assesseees decided to proceed with installing an energy efficiency measure. Whilst none of these schemes replicates the Green Deal, these conversion rates show that our assumption of a one in three rate is conservative by comparison.

There are a number of reasons for this approach. Firstly, some providers have indicated that they do intend to charge a small amount for assessments for the reasons discussed above¹⁶⁹. Secondly, we would expect an efficient market to find ways of minimising this cost, in particular by identifying unsuitable properties in a considerably shorter timeframe than would be required for a full assessment that includes Green Deal financial arrangements and sign-up. Thirdly, the measure installation costs presented in annex A already reflect part of the price of failed assessments; the search costs in the EEPH Call for Evidence include costs for unsuccessful bids for business. So, while Green Deal search costs may be greater than those in the pre-Green Deal world that EEPH refers to, a portion of those costs are already likely to be covered.

Our customer insight work evaluated the impact of an assessment charge at varying levels on consumers' propensity to come forward and these findings have been used as inputs in our modelling of take-up .

Interest Rate Repayment Structure

The Golden Rule principle helps to ensure that the annual Green Deal charge is lower than the expected fuel bill saving resulting from the installation of measures. Secondary legislation contains an option to prescribe or prohibit Green Deal finance terms to help ensure that bill savings continue to exceed repayments for the lifetime of the Green Deal plan. In order to help ensure customer confidence and therefore take-up, our consultation set out the options which provide the greatest certainty of this for the first and subsequent bill payers. This included fixed rate deals and those where the interest rate varies in line with the most appropriate component of the fuel and light index which forms part of the wider RPI index. Consultation responses did not show support for introducing interest rates on an index-linked basis. These were deemed to introduce an unnecessary layer of complexity and respondents welcomed the fact that a fixed rate Green Deal plan could be used to hedge against future energy price rises.

The overwhelming support therefore was to restrict interest rate regimes in the domestic sector to fixed rates, however there was some support for including the option that finance might be offered at fixed rates but feature a predetermined annual increase of the entire charge by 2% a year, in line with Bank of England inflation targets. This option will be a permissible basis for Green Deal charges. The motivation for deciding in favour of broadening the range of fixed interest charge structures is to enable a larger volume of installations to meet the Golden Rule. A fixed rate rising at a regular annual increment increases annual householder payments over the life of the Green Deal plan, but is likely to be matched, if not exceeded, by corresponding rising energy bill savings.

So, allowing Green Deal repayments to increase by 2% allows more measures to meet the Golden Rule meaning greater demand for measures and for Green Deal finance. It also means there is an increased risk of repayments exceeding bill savings. The following section analyses this trade-off and details how a 2% rising payment schedule is calculated in the GDHM.

¹⁶⁹ This would likely be rolled into the cost of the plan for successful assessments but be an up-front charge for unsuccessful assessments.

Imagine a Green Deal plan with principal of £3,000; a repayment period of 20 years and an interest rate of 7.5%. A flat repayment schedule gives a constant payment of £294.28 and means £5,885 is paid back in total (20 x £294.28). Using a rising 2% schedule, the *present value of this total should not change*.¹⁷⁰ Hence using this total and the fact that the payments must increase by 2%, the full payment schedule can be calculated algebraically. This is shown for comparison on the graph below:

Figure 40 Chart showing the difference between flat and 2% rising repayments

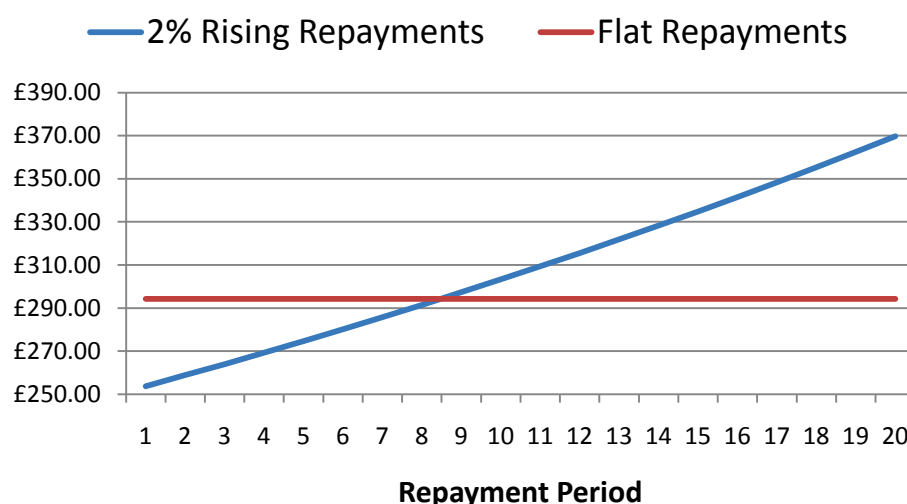


Figure 40 shows that more measures will meet the Golden Rule when charges are allowed to rise by 2%. This is because the Golden Rule is based only on the first repayment which, for any given plan, will be lower in the 2% scenario, meaning a lower bill saving is required for Golden Rule compliance.

The GDHM was used to model the demand effect of switching to a 2% rising charge. It predicts that switching from all flat repayments to all 2% rising repayments generates about 45,000 extra Green Deals in the first three years and £55m extra Green Deal finance over the same period.

To assess the increased risk of using a 2% rising charge we looked at historical retail fuel price data for 1971-2011 and projected data for 2012-2030. Situations in which repayments exceed bill savings can only arise if there are years in which energy prices rise by less than the repayments. Assuming a flat repayment structure, the data shows there are 10 such years out of 60. This only rises to 15 years under a 2% increasing repayment structure.¹⁷¹

It is also important to note that in these scenarios energy prices will be rising by less than projected inflation (assumed to be 2% based on Bank of England targets), so the fact that repayments could exceed bill savings during or immediately after these years may be offset by real savings on energy bills generally.

¹⁷⁰ This is because the interest rate is the same so the lender should get back the same in present value terms. But this does not mean the lender will get back the same in nominal terms. Nominally a person will pay back more when payments rise by 2%. This is because people value money today more than in the future. So a Green Deal provider will require higher overall payment if the charge rises by 2% because payments are back-weighted.

¹⁷¹ We also tested this using electricity retail prices and the results were almost identical.

For these reasons the central results from this Impact Assessment use a 2% rising charge.

Warranties

We were unable to model any costs relating to warranties in the Consultation Stage Impact Assessment as we did not have sufficient evidence available at that time to make meaningful assumptions about the cost that would be added to measures as a result. Subsequent work to understand the costs of warranties has led us to change our policy proposals in this area. An explanation of our previous and current policy is set out below. The costs of our current policy are included in the assumptions for this impact assessment.

The initial policy proposition as set out in the consultation document was that products should be warranted for the entire repayment period. This would provide maximum consumer protection and help ensure the Golden Rule continued to be met for the first and subsequent bill payers. The warranty was to be required to be insurance backed and be underwritten by an A rated company.

This proposal would have been relatively easy to fulfil for inert measures such as loft, cavity and solid wall insulation but, much more costly for measures with mechanical and electrical parts (boilers, ventilation etc). The policy would create disproportionate costs for Green Deal providers which would ultimately be passed onto the customer and could create a barrier to uptake. Evidence we have gathered on indicative costs indicates this requirement almost doubled the cost of a boiler. Our customer insight work and potential Green Deal providers have indicated purchases of boilers will be a key route to market, we therefore do not want to create substantial barriers to uptake.

The requirement for insurance backed warranties also undermined some existing industry insurance schemes which could lead to unnecessary costs being incurred. There was a risk that requiring warranties to be insurance backed would require Green Deal providers to comply with a number of FSA regulations which could significantly increase costs.

In addition, The Office of Fair Trading have recently studied the cost effectiveness of extended warranties. The study indicated that most extended warranties do not currently provide value for money. They noted that it was important to ensure customers have the option and should be encouraged to shop around for warranties rather than purchase them at the point of sale. The policy proposed in the consultation, requiring Green Deal providers to offer extended warranties as part of the plan eliminated consumer choice and restricted a competitive market in this area.

Taking this into account, our revised policy is that Green Deal providers will be required to offer a minimum period of mandatory cover (five years) for warranties and an extended ten year period of building damage cover which would provide cover for any consequential building damage sustained as a result of the measures being installed. This will apply to all measures with the exception of SWI and CWI which will require 25 year cover for product warranty and consequential building cover. This exception has been made as there are cost-effective warranties already available on the market for these measures.

Green Deal Providers will be able to reduce costs by demanding extended warranties from their manufacturers and installers, but for some measures the warranty requirements may increase the

cost of the plan. Some boiler manufacturers for example, offer five year warranties as standard and therefore no additional costs will be incurred. The costs of the 10 year consequential building cover are expected to be in the range of 1% to 2.5% of the overall cost of the Green Deal package depending on the risk of the Green Deal provider and the complexity of the measures involved.

Green Deal Providers will be able to differentiate their offers and provide customers with the choice to pay for an extended warranty or maintenance contract beyond the mandated period if desired.

Although this option significantly reduces costs and burdens, reducing the guarantee period does increase the chance that people will be paying for measures which no longer work. Repayment periods for measures extending beyond the warranty period could make some potential occupiers nervous about taking on the charge when there is no guarantee the product is working. This risk can, however, be mitigated through requiring evidence that maintenance regimes have been followed, providing comfort to potential occupants that boilers and other systems are working, as happens in the normal conveyancing process. New occupants will also be able to arrange service contracts for boilers and other measures if desired. In addition, tenants are likely to be protected by landlords lease obligations to ensure boilers, other systems and the fabric of a building are intact and working correctly. We will also place adequate information regarding warranties on the EPC to ensure full disclosure.

Insolvency Provisions

The Green Deal framework has been developed with the view that a Green Deal provider is present throughout the lifetime of the Green Deal plan and fulfils certain functions such as updating the central charge database and updating the EPC for disclosure purposes. It is also important that a Green Deal provider is present in order to allow the Secretary of State to sanction a Green Deal provider and revise a plan if appropriate (for example if the plan has been mis-sold or the plan has been disclosed incorrectly).

Our initial policy as set out in the consultation document, was to require Green Deal providers to hold a surety bond as a condition of authorisation, which would provide sufficient funds to transfer the above obligations to another authorised Green Deal provider in the event of insolvency or loss of licence. However, responses from the consultation and consultancy work commissioned have indicated this is a significant area of concern for potential Green Deal providers as it is likely to be expensive and may act as a barrier to entry for smaller firms, reducing competition in the market. Bonds were likely to cost between 1% to 4% of market share for Green Deal providers with a good credit score, rising to 10-15% for those with a weak credit score. There were also practical concerns relating to the amount Green Deal providers should insure and that a surety bond may not guarantee that another provider would be willing to take on these obligations.

Therefore Green Deal providers will not be required to have insolvency provisions in place at the time of authorisation. Instead, the Framework Regulations and the Green Deal Arrangements Agreement will ensure that, if the Green Deal Provider ceases to be authorised or is wound up, the most important ongoing obligations of the Green Deal Provider continue to be carried out by the person who is entitled to payments under the plan and customers can still, in appropriate cases, seek redress under the Green Deal legislative framework for failures of the Green Deal provider (or

its assignee). This policy will ensure customers receive an appropriate level of protection, but in a much more effective and cost-efficient way.

Independent Conciliation Service

Our initial authorisation conditions proposed that Providers would be required to have an Independent Conciliation Service in place to offer consumers an additional option for redress. This requirement may reduce the burden on the Ombudsman services and ensure independent redress for complaints regarding Green Deal plans. However, the consultation highlighted the high cost of including this requirement as a condition of authorisation.

The Independent Conciliation Service would only ever be voluntary for the customer to use and is not essential as customers would always have recourse to the Ombudsman. In addition, this requirement could increase the time taken for customers to obtain redress. Therefore it is felt this policy would impose additional costs but provide limited benefits and has therefore been removed.

Some Green Deal providers will have access to this service as many trade bodies offer this as a benefit of membership. We will therefore recommend in guidance this service be offered to customers as an option if available.

Green Deal Ombudsman

The consultation document set out how we would ensure redress in the Green Deal via extending the Energy Ombudsman Service's role.

The ombudsman landscape for the Green Deal needs to cover several different functions. First, there are the financial aspects, which will be covered by the existing Financial Ombudsman Service. Second, there are aspects relating to the collection of the Green Deal charge, which will be covered by the existing Energy Ombudsman Service (EOS) in its role as the Ombudsman dealing with issues around energy billing and collection. However, the Green Deal introduces new functions that require a redress service if something goes wrong.

An Ombudsman and Investigation service is needed to cover these areas, specifically investigating complaints and determining redress for customers, where these have not been resolved by Green Deal Providers. Green Deal Providers will be required to submit to the jurisdiction of the Ombudsman as part of their authorisation. It will also need to provide an investigatory and reporting role for the DECC Secretary of State to inform their decision on the use of the sanctions provided for in the framework regulations. Whilst this is not in Ombudsman function as such, we would expect it to be undertaken by the same entity providing the Ombudsman services.

However, recent legal work has identified that this would require an amendment to primary legislation that cannot be done within the timescale required for the ombudsman to be in place for the launch of the Green Deal. We are therefore instead procuring for an Ombudsman and Investigation function to fill this redress gap.

Annex H: Energy Company Obligation decisions

This section provides details of the major policy decisions for the Energy Company Obligation (ECO) which has impacted the costs and benefits of the policy. It provides a summary of how the final design of the ECO has changed since the consultation position, and analysis which has informed the final design decisions.

Summary of ECO Consultation Position and Final Proposal

A range of decisions around the Energy Company Obligation have been consulted on. A summary of the consultation position and final proposal for the policy is presented in the table below. Further details on the assessment underlying the final policy decisions which have impacted the costs and benefits of the ECO is presented in the following section.

ECO policy design consultation position and final proposals

Issue	Consultation question	Consultation position	Final proposal
Measures eligible for support under the Carbon Saving Obligation	11, 12, 13	Obligation should support primarily the households who live in hard to treat homes and cannot fully fund energy efficiency improvements through Green Deal finance alone. Solid Wall Insulation (SWI) as a key technology	SWI and Hard to Treat CWI (and heat reducing measures packaged with these) are eligible.
Measures eligible for support under the Affordable Warmth obligation	14, 16	Any measure which allows eligible householders to heat their homes more affordably, should be permitted under ECO AW. Extra incentives should not be put in place to support the installation of air or ground source heat pumps.	No change
Scoring of boiler repairs for the Affordable Warmth obligation	15	Open question - whether, and if so how, boiler repairs should be scored as an eligible measure under the AW obligation where they were more cost-effective than installing a replacement system.	Boiler repairs will be included within the affordable warmth scoring metric, but with a number of conditions in order to prevent perverse effects.
Household eligibility for Affordable Warmth support	31	Eligibility criteria proposed to be similar to the CERT super priority group but for those in private tenure only. Consulted on expanding the group to include Working Tax Credit under £16k income and children in full time education up to 19.	Decision to expand the eligible group to include those on certain elements of working tax credit under a household income of £15,860 and those in receipt of qualifying means tested benefits with children aged 19 years or under in full time education.

Issue	Consultation question	Consultation position	Final proposal
Referrals	32	Pursue a voluntary agreement with ECO obligated companies concerning a commitment to follow up referrals from the government-procured Energy Saving Advice Service.	No change
Including a Distributional Safeguard in the ECO	33	<p>No distributional safeguard assumed in the consultation assessment</p> <p>Open question - asked for views on whether the benefits of ECO are likely to be distributed equitably, or whether regulatory intervention would be necessary to ensure a more equitable delivery pattern.</p>	<p>An area based "Carbon Saving Communities" (CSC) obligation focusing on the delivery of carbon reduction measures (easy and hard to treat) to the 15% most deprived areas in Great Britain will be introduced.</p> <p>Suppliers will be required to deliver at least 15% of their CSC obligation to households in rural areas (the "Rural Safeguard" target).</p>
Design of, and trading on, the brokerage	51, 52, 53, 54	<p>Preferred consultation option was to introduce a voluntary market-based brokerage to link ECO and Green Deal finance.</p> <p>Asked whether mechanism should be voluntary, and level of ECO that should be channelled through brokerage.</p>	Government will publish a further consultation on brokerage in Summer 2012.
Size of the Affordable Warmth and Carbon Saving Obligation targets	56, 57	25% of the average annual £1.3bn ECO spend on Affordable Warmth, 75% on Carbon Savings Obligation	<p>No change to Affordable Warmth, remains 25% of average annual ECO spend.</p> <p>The remaining 75% carbon target spend will be split between around 80% on the Carbon Saving obligation and 20% on the Carbon Savings Communities obligation. At least 15% of the CSC obligation must be delivered to households in rural areas. .</p>
Division of the ECO between energy suppliers	58	<p>Two possible approaches set out in consultation for calculating market share.</p> <ol style="list-style-type: none"> 1) Obligations proportional to market share with a straight exemption for companies with less than 250,000 customer accounts 2) Discounting the first 250,000 customer accounts when calculating market share. <p>The consultation also considered whether market share should be based on numbers of customer accounts or amount of energy sold.</p>	<p>Obligation set based on no obligation at 250,000 customer accounts and a full market share obligation at 500,000 accounts with a linear ramp up between.</p> <p>However, customer account numbers will be translated into kWh of gas and electricity so that obligations are based on sales but gas suppliers and electricity suppliers bear an equal burden</p>

Issue	Consultation question	Consultation position	Final proposal
Assessment methodology for the ECO	59	Scoring based on bespoke assessments of the likely savings generated in each house where measures are installed.	No change
Target metric for the Affordable Warmth and Carbon Saving Obligation of the ECO	60	Affordable Warmth obligation scored on the basis of SAP-based, lifetime energy bill reductions. Carbon Savings obligation scored on the basis of annual carbon savings.	No change to Affordable Warmth. Measures under the Carbon Savings Obligation and the Carbon Saving Communities will be scored on the basis of lifetime carbon savings.

Measures Eligible for Support Under the Carbon Targets

The section provides details of the analysis underlying the policy decision on the scope of the ECO target aimed to reduce greenhouse gas emissions. The final ECO policy position is that there will be two obligations for measures intended to reduce emissions in the domestic sector: the “Carbon Savings” obligation and the “Carbon Savings Communities” obligation.

Eligible measures under the Carbon Saving obligation (CSO) are:

- Solid Wall Insulation (SWI) and other measures that reduce heat loss from buildings delivered with SWI ; and
- Hard to treat Cavity Wall Insulation (HTT CWI) and other measures that reduce heat loss from buildings delivered with HTT CWI.

Eligible measures under the Carbon Saving Communities (CSC) obligation are:

- Full range of insulation measures, including all SWIs, CWIs and Loft Insulations (LIs).

The Carbon Saving Communities obligation is intended to deliver measures to properties in low income areas (see the next section for details). The modelling for Carbon Saving Communities allows subsidy for all CWIs and LI in properties in the 15% most deprived Lower Super Output Areas¹⁷². The distributional considerations of this final option are presented in the next section.

Consultation Proposal & Responses

The consultation proposed that the ECO CSO should focus on more expensive energy efficiency measures in the domestic sector. It would therefore support primarily households who live in hard to treat homes and cannot fully fund energy efficiency improvements through Green Deal finance alone. The consultation proposed that SWI was a key technology for the ECO CSO to support but highlighted that there may be other hard to treat technologies which could also be eligible. The consultation also proposed that other measures would be classified as eligible under the CSO if they were promoted as part of a package that includes SWI. The modelling carried out for the consultation assumed that ECO CSO subsidy was only available for SWI and other measures packaged with it.

¹⁷² See “Balance Between ECO Carbon and Fuel Poverty Objectives” for definition

Several consultees, including the insulation industry and the Committee on Climate Change¹⁷³, expressed concern about relying on the Green Deal market to deliver LI and CWI rather than having more certainty of delivery through including these within ECO CSO regulation. The insulation industry was concerned about a possible “cliff edge” in the delivery of insulation measures currently subsidised under existing supplier obligations (CERT and CESP), and the impact this could have on the industry. The Committee on Climate Change expressed concern that the exclusion of Lofts and Cavities from the CSO would prevent the uptake of the remaining potential of these measures and the impact this could have on carbon budgets. Potential Green Deal providers, however, have informally expressed concerns that a move to subsidisation of all LI and CWI in the carbon target could jeopardise their business model. Concerns were also raised informally by the solid wall supply chain that the inclusion of lofts and cavities in ECO would go too far in displacing the number of solid wall insulations.

Analysis of the Issue

There are several potential issues with restricting the scope of the carbon target elements of ECO to primarily focus on SWI as proposed in the consultation. These include:

- **“Cliff-edge” in CWI delivery:** If CSO eligibility was restricted to SWI only, CWI delivery in 2013 could be under half the rate of CWI delivered in the last few years of CERT (see Figure 41 below). The opportunities for CWI are being exhausted so it is inevitable that the delivery rate for CWI will naturally decline. However, this option could lead to a sudden drop in delivery rather than a steady transition away from subsidising all CWIs, and could have negative impacts on the existing CWI industry.
- **Not all the remaining cost-effective CWI and LI potential beyond CERT extension would be delivered under the policy proposal:** Without ECO subsidy for lofts and cavities, consumer demand and take-up of these measures would be lower, despite the availability of Green Deal Finance and supporting policies and incentives. By 2022, 24% of the CWI technical potential would be filled by Green Deal Finance if these measures were excluded from ECO. In particular few hard to treat cavities would be filled because they will often not meet the Golden Rule without subsidy.
- **SWI supply chain constraints:** Evidence suggests that the industry’s ability to deliver SWI in the first few years of the ECO would constrain the delivery of SWI below what was assumed in the consultation impact assessment. Industry’s view on the potential for SWI ramp-up is reflected in this assessment (see annex A for details).
- **Uncertainty over SWI effectiveness:** Emerging evidence on SWI has resulted in significantly reduced estimated cost-effectiveness for these technologies than was assumed in the consultation (see annex A for detailed SWI assumptions).

There are several options to address the issues above in the ECO policy design. This analysis considers three options for broadening out the scope of the ECO carbon target in terms of the inclusion of LI, CWI and other measures.

¹⁷³ <http://downloads.theccc.org.uk.s3.amazonaws.com/Green%20Deal/green%20deal%20letter%20-%20201211.pdf>

- Option 1:** (Consultation proposal) SWI stand alone, and “other measures”¹⁷⁴ packaged with it. CWI and LI in the Affordable Warmth obligation only)
- Option 2:** SWI stand alone, LI and “other measures” packaged with it; and Hard-to-Treat CWI stand alone, LI and “other measures” packaged with it
- Option 3:** SWI, all CWI and LI stand alone

These three high-level options are analysed to illustrate the principal trade-offs associated with the inclusion of loft and cavities in the carbon savings target. There is a continuum of options in between the two extremes of Options 1 (consultation proposal scope) and Option 3 (full inclusion of LI and CWI). This assessment analyses one such variant (Option 2), in which the inclusion of CWI is limited to the more difficult to treat, and therefore more expensive, CWI potential.

There are further options for LI and CWI inclusion in the ECO carbon target beyond the technology eligibility criteria options above. Analysis of two such options, a differentiated scoring rule between technologies (“exchange rate” approach) and full inclusion of loft and cavities to an earmarked group of properties on an area basis (“Carbon Saving Communities”), are provided in section C below.

There are potential downsides to allowing ECO to subsidise relatively cost effective technologies like LI and low cost CWI (some of which meet the Green Deal “Golden Rule”). These downsides include:

- Subsidising of measures that would have otherwise been paid for by Green Deal Finance. The carbon savings from these measures would not be additional.
- The possibility that large amounts of ECO is spent on subsidising measures above consumers’ reservation level of subsidy -“**additional subsidy**” (this is referred to in the following section as “**rent**”¹⁷⁵).
- There are distributional dis-benefits where ECO subsidy crowds out Green Deal Finance. The cost of ECO will be borne by all energy consumers, whilst the cost of measures taken delivered with Green Deal will be paid for by the beneficiary. These dis-benefits are greater when funding measures which would meet the golden rule.

Quantitative results from option analysis

Modelling of the three options highlights the inevitable trade-offs associated with broadening out the scope of the ECO carbon target obligation. .

¹⁷⁴ “other measures” could refer to all measures listed in Annex A of the Green Deal and ECO consultation document. However, for the purpose of the modelling for this analysis, only those measures that we believe could be financed as part of a package and which would provide a reasonable level of aggregate savings have been included. These include floor insulation, draught-proofing and double glazing.

¹⁷⁵ The term rent here is used to describe intra-marginal rents. These rents are due to heterogeneity in costs of generating ECO points across households. Intra marginal rents will be realised by non-marginal sources of abatement/ECO points, i.e. by the generation of points from households on the ECO point supply curve left of the marginal source.

The **uptake of SWI** will be lower where suppliers can deliver their obligation by subsidising lower cost measures like CWI, as suppliers have the incentive to deliver carbon savings at the lowest cost. The total uptake of insulation measures is greatest under Option 3, where uptake is predominantly CWI. However, the analysis suggests that in this scenario the uptake of SWI is significantly lower, and possibly below a level which could be needed to develop the future supply chain for this industry. SWI uptake is highest under Option 1 at 275,000 to March 2015.

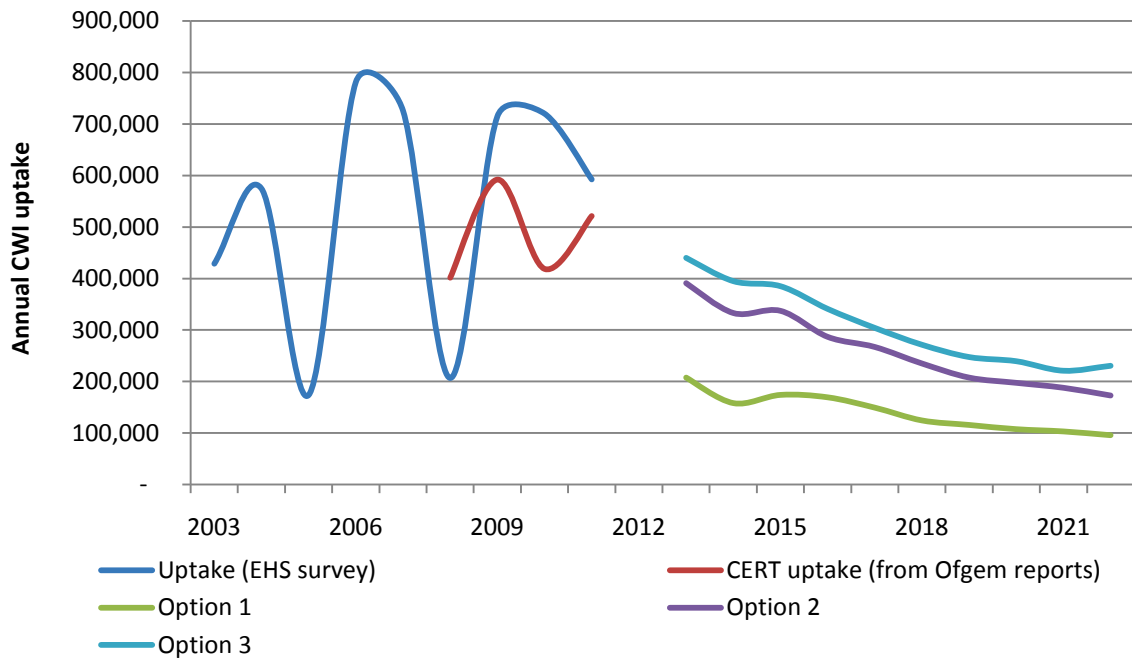
Table 70 Cumulative uptake of CWI and SWI under Options 1, 2 and 3 to March 2015

	Option 1	Option 2	Option 3
SWI	275,048	170,066	114,843
CWI (total)	409,669	808,084	931,442
<i>“Easy”</i>	344,966	346,839	579,388
<i>“Hard”</i>	64,704	461,244	352,054
LI	247,496	338,528	481,739

Higher delivery of insulation measures leads to higher non-traded **carbon savings**. These savings are higher p.a. in March 2015 under Options 2 and 3 (at 0.31 MtCO₂ and 0.36 MtCO₂ respectively) compared to Option 1 (0.12 MtCO₂). However, although a higher carbon target for the ECO could be set with the full inclusion of all cavities and lofts, much of this increase might not be additional – they are savings that would have been delivered by Green Deal Finance alone under the other options.

A **“cliff-edge” delivery in CWI** from recent delivery rates is mitigated under Options 2 and 3 relative to the consultation proposal. CWI uptake is higher under Option 2 than Option 1 because of the inclusion of hard to treat cavities in Option 1. The uptake of “easy” to treat CWI is particularly high under Option 3. Much of the uptake of “easy” CWI under Option 3 is not additional, as around 345,000 of these cavities would have been taken up with Green Deal finance only (as under option 1 and 2).

Figure 41 Uptake of CWI under Options 1, 2 and 3

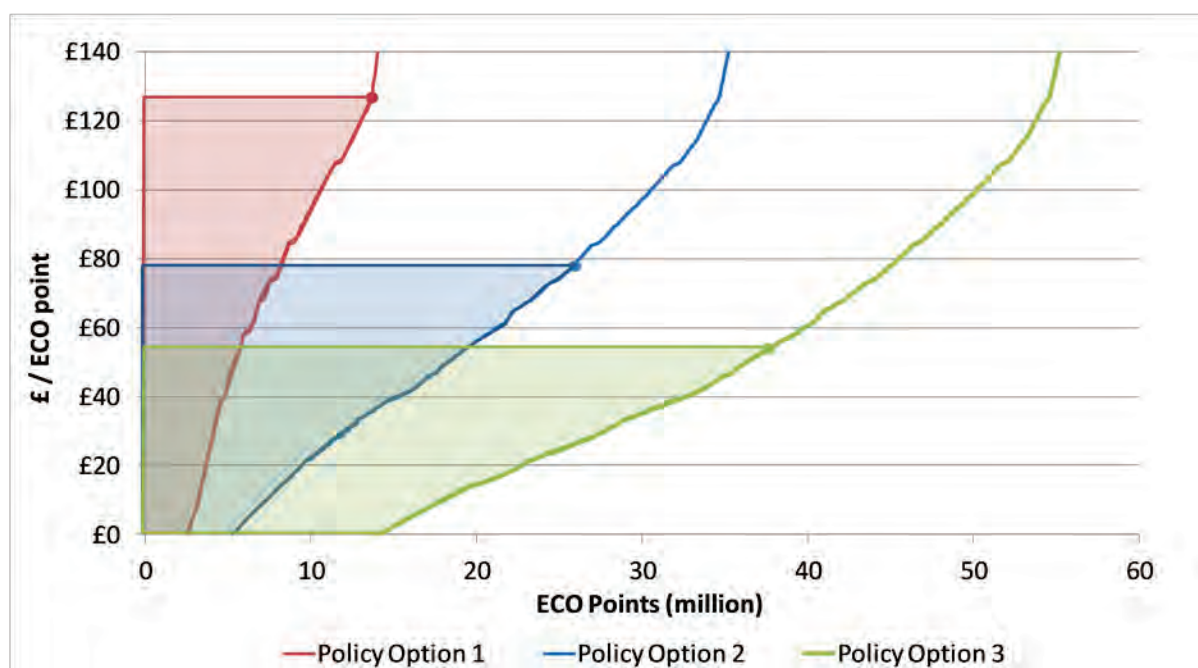


The amount of **Green Deal Finance** is greatest under Option 1 at £692m to March 2015. There is a significant negative impact on Green Deal finance under Option 3 (£178m lower), and only a marginal decrease under Option 2 (£9m lower). Low levels of Green Deal finance such as those under Option 3 could have a knock on effect on the Green Deal market by increasing the interest rate offered. However, it is not possible to capture this effect in the modelling.

The options with the broader inclusion of lofts and cavities have a lower **marginal subsidy cost** per ECO point. Under Option 3, the marginal subsidy cost per ECO point for the period to March 2015 is £57. The marginal subsidy cost of an ECO point is significantly higher under Options 1 and 2 at £157 and £83 per ECO point respectively.

The amount of ECO spend that is **rent** is similar under Option 1 and 2 (59% and 62% respectively), and greater under Option 3 (72%). The amount of rent under each of the options to the period to March 2015 is illustrated by the shaded areas in Figure 42.

Figure 42 ECO point supply curves and rent (period to March 2015)



The ECO point supply curve shifts downwards where relatively lower cost sources of generating ECO points are introduced, as non-SWI measures have lower costs and require lower subsidy per ECO point to generate uptake. The shape of the supply curve is affected amongst other things by consumers' aversion to taking up measures and the costs of measures and Green Deal plans.

The amount of ECO points generated which would have required zero ECO subsidy is significantly higher under Option 3 (14 million ECO points) than under Options 1 and 2 (5.3 million and 2.5 million ECO points respectively) for the period to March 2015. Indeed, under Option 3, around £799m is spent subsidising measures that would have been delivered anyway without ECO carbon target subsidy over this period. This is almost double the comparable figures for Options 2 (£435 million) and 1 (£390 million).

The **Net Present Value** (NPV) of the cost and benefits of the options is greater the lower the amount of SWI uptake across the options. Therefore, the NPV of Option 3 (£9.5bn) is significantly greater than that of Option 1 (£4.5bn) and also of Option 2 (£7.7bn), as there is a large net benefit to the delivery of Cavity Wall insulation. This impact must be weighed against the other drawbacks of Option 3 discussed above (see conclusion below).

Table 71 NPV (calculated over the lifetime of the measures) of the three options

NPV (£m)	Option 1	Option 2	Option 3
SWI	-£899	-£891	-£881
CWI	£2,721	£5,965	£7,799
	£115	£185	£211

Affordable Warmth, Non-Domestic, Cost of Business ¹⁷⁶	£2,526	£2,479	£2,396
Total	£4,463	£7,737	£9,524

Further option for inclusion of LI and CWI

There are other dimensions to defining the ECO scope beyond the technological eligibility criteria. Options for this include, but are not restricted to, inclusion of LI and CWI for properties in particular low income areas (“Carbon Saving Communities”), differentiating the scoring of technologies in terms of ECO points through an “exchange rate”, ring-fencing the delivery of hard to treat measures, and/or providing transitional support for LI and CWI (through, for example, cash incentives). The first two options are explored below.

Exchange rate approach

The preceding analysis in this annex assumes that eligible technologies in the different scopes generate “ECO points” on the same basis, so 1 tCO₂ reduction from the installation of an “easy” CWI generates one ECO point on the same basis as 1 tCO₂ reduction from a SWI. An alternative approach is to amend the scoring of ECO points, differentiating by technologies. The scoring rule could be amended such that the most cost effective measures, like LI and CWI, receive a lower score per tonne of CO₂.

This differentiated “scoring rule” would lower the attractiveness of suppliers to subsidise LI and CWI, which would have an impact particularly under Option 3. The high level impact of a scoring rule where CWI and LI only receives half an ECO point per 1 tCO₂ reduction under Option 3 is presented below.

Table 72 Summary impacts of Option 3 with and without an exchange rate (for period to March 2015)

	Option 3	Option 4 – exchange rate
Carbon savings p.a. in March 2015 (MtCO₂)	0.36	0.37
SWI	114,843	182,923
CWI (total)	931,442	837,114
<i>“Easy”</i>	579,388	556,537
<i>“Hard”</i>	352,054	280,577
LI	481,739	454,451
Green Deal Finance (£m)	£514	£574
£/ECO point	£57	£92
Rents (£m)	£1,531	£1,401

This option could mitigate some of the negative implications of including LI and CWI in the carbon target by reducing rents and the subsidisation of measures that would have been delivered by Green

¹⁷⁶ The total NPV to incorporate Affordable Warmth, Non-Domestic, and Cost of Business is assumed for simplicity to be identical to the Central Estimate value for each of these options. In reality there will be small variations from this central estimate dependent on uptake, however these variations are negligible in size.

Deal Finance. However, there is a risk that Government would set the exchange rate inefficiently with this approach. The result would be that the incentive structure would not lead to an “optimal” level of uptake of measures that balances the aim of reducing the cliff-edge in delivery, and excessive rents being generated.

Should Government set the rate too low (few ECO points generated per unit reduction in carbon savings from CWI and LI) there would be a limited impact on the uptake of measures relative to Option 1. Setting the rate too high (near a 1-to-1 rate) would risk large rents as under Option 3. It is not clear how the Government would be able to set an optimal rate. The exchange rate approach would therefore introduce administrative complexities to the ECO with the risk of low associated benefits.

“Carbon Saving Communities”

The final ECO policy decision is for an expanded ECO technology eligibility for certain sub-groups of the population. Within the “Carbon Savings Communities” obligation, all insulation measures, including all CWI and LI are eligible. The detailed results of analysis of this option are presented in the main body of the IA. The high-level results are presented here for ease of comparison with the other options analysed in this annex.

Table 73 Summary impacts of the “Carbon Saving Communities” option (for period to March 2015)

	Option 8 Carbon Saving Communities
Carbon savings p.a. in March 2015 (MtCO₂)	0.30
SWI	146,556
CWI (total)	830,038
<i>“Easy”</i>	383,536
<i>“Hard”</i>	446,502
LI	364,433
Green Deal Finance (£m)	£616
£/ECO point	£77
Rents (£m)	£1,365

Conclusion

There are inevitable trade-offs associated with broadening out the scope of the Carbon Saving Obligation beyond the consultation proposal. These are illustrated by comparing the headline results of the quantitative analysis of the five options:

Table 74 Headline results from comparison of options (all figures are for period to March 2015, except NPV which is calculated for measures delivered up to 2022)

	Option 1	Option 2	Option 3	Option 4	Option 8 (chosen option)
Domestic sector carbon Savings p.a. in March 2015(MtCO₂)	0.12	0.31	0.36	0.37	0.30
SWI	275,048	170,066	114,843	182,923	146,556
CWI	409,669	808,084	931,442	837,114	830,038
LI	247,496	338,528	481,739	454,451	364,433
Green Deal Finance (£m)	£692	£683	£514	£574	£616
£/ECO point	£157	£83	£57	£91	£77
Rents (£m)	£1,271	£1,322	£1,531	£1,401	£1,365
NPV (£m)	£4,463	£7,737	£9,524	£8,940	£8,305

Continuing with a focus for ECO carbon subsidy on SWI only is projected to lead to a sharp reduction in the delivery of cavity wall insulation, and the carbon savings realised are lower than under the options considered for inclusion of LI and CWI.

At the one extreme, a full inclusion of LI and CWI (Option 3) would provide a simple continuation from CERT and lead to larger carbon savings and a higher NPV. However, there are negative consequences of this option in terms of subsidising measures that could have been delivered without subsidy and reducing the scale of the Green Deal Finance market. In addition, it is estimated that 72% of the total ECO spend would be rent under this option. The large share of ECO spend on measures that could have otherwise been delivered with Green Deal finance only under Option 3 provides a poor value for money case. This option would also lead to a slower start to the SWI industry, which would have negative impacts on the future development of the SWI supply chain – with implications for longer term cost effective carbon savings.

A partial inclusion of CWI could mitigate the “cliff-edge” effect and have a limited negative impact on the Green Deal finance market, compared to Option 3. A partial inclusion of in a separate obligation, as under the “Carbon Savings Communities” option, could provide greater certainty of outcomes than if done via an “exchange rate” mechanism. The options for partial inclusion have a less detrimental impact on the Green Deal Finance market than a full inclusion. The analysis of all the options are also sensitive to the underlying input assumptions.

Balance Between ECO Carbon and Fuel Poverty Objectives

There is a limit on the resources that can be spent to deliver under the ECO obligations. The policy has multiple objectives leading to inevitable trade-offs between the achievement of carbon reduction and fuel poverty objectives. There are also several complicated factors contributing to the uncertainty around the need for a more progressive distribution of benefits under the ECO beyond the consultation proposal.

This section provides details of the analysis to support the decision for the ECO to consist of:

- An Affordable Warmth target aimed at reducing heating costs for low income and vulnerable households at risk of fuel poverty, accounting for approximately 25% of the scheme's resources;
- A Carbon Saving Obligation (CSO) focused on delivering SWI and hard-to-treat CWI in conjunction with the Green Deal, accounting for around 60% of the scheme's resources; and
- An area based Carbon Saving Communities obligation focusing on the delivery of carbon saving measures (including easy to treat CWI and loft insulation) to the 15% most deprived areas of Great Britain.

It is anticipated that under this proposal the total share of the scheme's resources targeted at low income and vulnerable households through the three obligations equates to over 50%.

Consultation Proposal & Responses

The consultation proposal was for the anticipated resource costs of the ECO, around £1.3bn per year, to be split approximately 75:25 between the Carbon Savings Obligation (CSO) and Affordable Warmth (AW) obligation. The consultation included a question asking whether the proposed split would lead to an equitable distribution of benefits, and in light of that whether any further steps should be taken to ensure distributional equity through a distributional safeguard. The central consultation option did not include such a safeguard, but views were sought on the need for (and possible structure of) a safeguard.

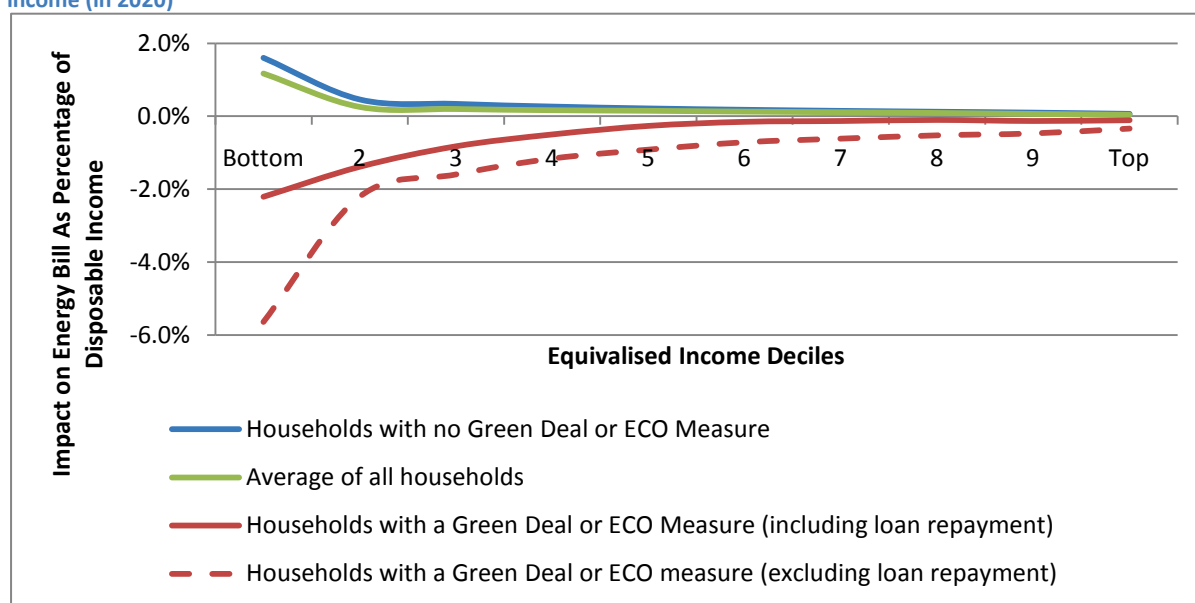
There were differing views among consultees on what the split between ECO CSO and AW should be. Consumer groups, fuel poverty groups, devolved administrations and local authorities expressed concern that the proposed scale of the AW was not adequate. Many of these groups argued for a shift between CSO and spending on fuel poverty objectives. Some energy suppliers also supported this view.

Other stakeholders, particularly Green Deal providers, raised concerns that a change to the balance would increase costs, reduce carbon savings potential and undermine delivery by the Green Deal Providers. There was also concern among providers about the overall scale of private finance in the market, identified as the most important risk to their feasibility.

Incidence of ECO Costs & Benefits

Based on the analysis undertaken in the consultation Impact Assessment, it is anticipated that the costs of delivering the ECO will be recouped through energy bills, which would likely be regressive (see Figure 43 for the estimated distributional impacts from the consultation stage Impact Assessment). On average, low income households spend a greater proportion of their income on energy bills. An increase in energy bills because of the costs of the ECO will represent a greater percentage reduction in their disposable income. For those who take up a measure under the ECO, energy bills are reduced. The reduction as a percentage of disposable income is larger for low income households. However, on average the net cost of the consultation proposal for the ECO was estimated to be **regressive**, with low income groups paying more.

Figure 43 Change in energy bill as a results of Green Deal and ECO (CONSULTATION PROPOSAL) as a percentage of income (in 2020)



Distribution of the Benefits Under the ECO Consultation Proposal

Under the consultation proposals, there was a high degree of confidence that low income and vulnerable households will benefit from measures installed under the Affordable Warmth target because measures will be delivered to a relatively small and tightly defined group. The distribution of the overall benefits will therefore depend on the share of ECO spend on AW and the distribution of installations from the Carbon Savings Target.

It is not possible to predict precisely how the take up of measures under the CSO will be distributed across income groups, and there is a significant degree of uncertainty, regarding which measures will be installed under the target will depend on a number of factors, some of which are discussed below. It should be noted that this uncertainty notwithstanding, the modelled delivery of measures under the CSO in the consultation Impact Assessment resulted in around 20% of measures being delivered to low income households.

Technical potential

In the absence of other factors that skew delivery, the delivery of measures under the Carbon Target should reflect the distribution of the potential for ECO points. ECO (Carbon Target) points are generated by installing measures in 'hard to treat' houses. These properties are evenly distributed across income groups. However, higher earners tend to live in larger, harder to treat properties which use more energy and have a larger scope for carbon savings. The technical potential for ECO points may therefore be skewed towards higher earners, although there are fuel poor households across the housing spectrum.

Cost effectiveness

Other things being equal, the more cost-effective a measure is, the **less subsidy** that will have to be offered to make it an attractive option. If cost-effective potential is unequally distributed across income groups this could skew the delivery of benefits under the Carbon Target.

Social housing provides natural opportunities for suppliers to deliver at scale and thus at relatively low cost. The lowest income groups represent almost half of all tenants in social housing. These tenants could benefit disproportionately from energy efficiency measures. Nevertheless, social housing tenures represent a smaller proportion of the technical potential for wall insulation than the owner occupied and privately rented properties.

The costs of solid wall insulation include an element of fixed costs and an element of variable costs. Larger properties will cost less per unit of wall area treated because of the fixed costs. Modelling suggests that **larger properties are more cost-effective** to treat as a result. Other things equal, this may encourage delivery of measures under the carbon target to higher income households.

Regulation of the Private Rented Sector (PRS)

PRS regulation would increase demand for energy efficiency measures in this sector, and would benefit households in this type of tenure. This regulation would benefit tenants in rented properties, the majority of which are in the lowest income groups. The overall impact of this is likely to be modest, however, as benefits would be restricted to the 15% of housing that is privately rented (of which only around 20% are fuel poor).

Willing to (part) self-finance the costs of installing measures

The higher the willingness to self-finance, the less subsidy energy suppliers will have to offer. There are a number of reasons why ability or willingness to self-finance (either through the Green Deal, or other sources of finance) may be lower for low income groups, in particular because many under-heat their homes and will achieve lower energy bill savings¹⁷⁷. On the other hand, the Green Deal Finance mechanism may do more to relieve credit constraints for low income households than the wealthy.

Analysis of Options for Altering the Distribution of ECO Benefits

A greater certainty of a progressive distribution of ECO benefits could be achieved by doing one or more of the following:

- altering the split in the level of ECO spend between the two obligations;
- adding a sub-obligation to one of the obligations; and/or
- changing the scope or focus of the obligations.

This section sets out five options that have been considered to provide greater certainty over the distribution of ECO benefits compared to the central consultation option.

¹⁷⁷ The evaluation of the Warm Front scheme in 2008 showed that low income households eligible for the scheme tended to heat their homes (17.9°C) without thermal efficiency measures, whereas the last time national average indoor temperatures across all income groups was measured, the average was above 19°C (EHS 1996).

Option 2: Consultation Proposal but with HTT CWI included in scope of ECO. Eligible measures in the ECO are SWI stand alone, hard to treat CWI, and other measures included in packages . Easy to treat CWI and LI are included in the Affordable Warmth obligation only. The split between the AW target and CSO target is 25%/75% respectively.

In all the other options the CSO target is used to deliver stand alone SWI *and* hard to treat CWI, and other measures packaged with it.

Option 5: Increase the size of the Affordable Warmth target. The AW target would increase and the CSO target would reduce by a corresponding proportion so the estimated total costs of the ECO remain the same. This would guarantee a greater proportion of the ECO's resources are targeted at low income and vulnerable households, through a likely mix of heating and insulation measures. The quantitative analysis undertaken here is based on increasing the AW target to around 35% of total ECO resources, and the remaining 65% focusing on measures under the CSO.

Option 6: Include a sub-obligation within the CSO to ensure a proportion of 'hard to treat' insulation is targeted at low income homes. The AW and CSO targets would remain at the levels proposed in the consultation, with a sub-obligation on the CSO guaranteeing that 20% of measures delivered under the CSO are delivered to low income and vulnerable homes. The proxy applied to represent this group in the analysis is households claiming passport benefits that qualify them for Affordable Warmth, but extended to include social tenure.

Option 7: Expand the list of measures that could be scored under the CSO if delivered to low income households/areas. The list of measures that count under the CSO would be expanded, providing the 'additional' measures (such as easy to treat cavity wall and loft insulation) are targeted at low income communities (in line with an area based approach). The proportion of the CSO that could be met in this way would be capped (up to 20% in the analysis here) to ensure sufficient focus of the CSO on driving the Green Deal.

Option 8: Set an area based obligation ("Carbon Saving Communities") targeting carbon saving measures at low income communities. A third obligation would be set whereby participating suppliers would be required to deliver carbon savings to households living in the most deprived areas. Qualifying measures would focus on carbon reduction, and delivery would be restricted to the 15% of areas scoring most prominently on the Index of Multiple Deprivation of each GB country. As defining low income communities by geographic boundaries is not always effective at capturing rural poverty, this option contains a safeguard to ensure that rural households are not disadvantaged. Suppliers will be required to deliver 15% of their overall Carbon Saving Communities obligation to rural, low income households.¹⁷⁸

¹⁷⁸ Eligibility for this option can be summarised as: households living in one of the 15% lowest scoring LSOAs in England according to the English Index of Multiple Deprivation; households living in one of the 15% lowest scoring LSOAs in Wales according to the Welsh Index of Multiple Deprivation; households living in one of the 15% lowest scoring data zones in Scotland according to the Scottish Index of Multiple Deprivation; households in an adjacent LSOA or data zone to a qualifying LSOA or data zone where measures have already been delivered to that qualifying LSOA or data zone (suppliers may deliver no more than 20% of measures to

The table below summaries the quantitative analysis of the 5 options:

Table 75: Key results of distributional equity options

	Option 2 Consultation proposal with HTT CWI in ECO	Option 5 Increase AW Target	Option 6 CSO Sub-obligation	Option 7 CSO Sub-obligation with expanded scope	Option 8 Carbon Saving Communities
Carbon Savings p.a. in March 2015 (MtCO₂) savings p.a.	0.31	0.21	0.31	0.30	0.30
AW eligible group lifetime bill savings (£m)	7,109	9,100 (+28%)	7,528 (+6%)	7,645 (8%)	7,430 (5%)
“Easy” CWI uptake	346,839	376,012	344,691	353,991	383,536
<i>of which in low income areas</i>	143,658	172,847	142,643	151,944	148,773
“Hard” CWI uptake	461,244	436,421	458,991	450,868	446,502
<i>of which in low income areas</i>	56,888	52,998	68,184	54,726	51,381
LI uptake	338,528	360,378	337,475	340,038	364,433
SWI uptake	170,066	158,793	172,040	164,666	146,556
<i>of which in low income areas</i>	45,954	42,722	51,972	44,598	34,210
Heating systems to low income households (to March 2015)	276,000	359,000	279,000	283,000	279,000
Green Deal Finance (£m)	£683	£696	£682	£653	£616
NPV (£m)	£7,737	£8,203	£7,717	£8,006	£8,305

The analysis alone does not clearly identify a single preferred option. It also does not incorporate a number of key risks, such as ‘cliff-edge effects’ or the minimum level of Green Deal finance required for the market to function. On balance, however, Option 8 provides the best balance between guaranteeing a greater share of ECO benefits accruing to low income households, maintaining a similar level of carbon reduction ambition as in the consultation proposal, driving the Green Deal market and increasing the overall NPV of the policy.

Option 8 delivers the greatest NPV of all the options. This is driven by the greater emphasis on delivering relatively low cost easy to treat cavity wall insulation generated by the area-based target. The impact of each option on total carbon savings from Green Deal and ECO is determined by two main factors: the uptake and mix of insulation measures (which increases carbon savings) and heating measures (which typically reduce non-traded carbon savings). Uptake rates will in turn depend on the cost of driving demand and the share of the ECO focused on insulation measures. All options except Option 5 deliver similar levels of carbon savings in 2015. The lower level of non-traded carbon abatement under Option 2 is driven by the greater emphasis on heating in ECO

adjacent areas); households living in rural areas (settlements with less than 10,000 dwellings) and are in receipt of Affordable Warmth qualifying benefits.

overall through a higher Affordable Warmth target, which while delivering significant traded carbon savings, tends to reduce the overall non-traded carbon savings from the policy.

Uptake of SWI is broadly the same or lower in all options relative to Option 2. This results from either reducing the resources dedicated to SWI (Option 5), a greater level of subsidy for SWI in low income homes (Option 6), or a greater emphasis on less expensive insulation (Options 7 and 8). Uptake of hard to treat CWI remains broadly similar across all options.

The level of Green Deal Finance remains broadly similar in Options 5 and 6, but falls in Option 7 and 8 relative to Option 2. Options 7 and 8 result in more measures being delivered to low income households, which typically require higher levels of subsidy, which reduces the scope for Green Deal Finance. However, the cost effectiveness of the greater levels of CWI in Options 7 and 8 appears to result in sufficient ECO subsidy to drive the Green Deal market such that the largest reduction in Green Deal Finance is only around 10% compared to Option 2. Option 6 requires greater levels of subsidy for relatively expensive measures in order to ensure 20% of CSO measures are delivered to low income groups, resulting in a slightly lower level of ECO resources to drive the Green Deal market for other households. Option 5 unexpectedly results in a greater level of Green Deal finance, suggesting that under Option 2 ECO subsidy crowds out the Green Deal, and this is reduced by rebalancing resources towards the AW target.

Lifetime bill savings accruing to low income households is greatest under Option 5. This is due to Option 5 delivering the greatest number of heating and insulation measures to low income groups. All other Options maintain a fairly similar overall level of lifetime bill savings relative to the consultation proposal.

Allocation of the Obligation

The consultation sought views on how the ECO should be divided between obligated energy suppliers. This section summarises the analysis supporting the Government's decision that:

- Only energy suppliers with more than 250,000 customer accounts are required to participate in the ECO
- The obligation is divided between energy suppliers on the basis of their energy sales, with half the obligation being allocated on the basis of gas sales and half on electricity sales
- The obligation is tapered for smaller suppliers passing through the threshold, but in a way which is not expected to increase the costs associated with the ECO

Participation in the ECO

Small suppliers with 250,000 customer accounts or less are currently exempt from having to participate in environmental and social programmes such as CERT and CESP. The rationale for this exemption is to reduce the barriers associated with entering the retail energy market, promoting competition and innovation in the market to help drive down consumer bills. The consultation responses, on balance, suggested that 250,000 customer accounts was an appropriate threshold for participation in the ECO.

It is recognised that it is in the interest of small suppliers to continue to pursue growth and some smaller suppliers have indicated that they may pass through this threshold before March 2015. As set out in the recent consultation on thresholds¹⁷⁹, it is not the Government's intention to continue to increase the threshold, but instead to consider ways in which future obligations, such as the ECO, can be designed to minimise any disproportionate burden faced by small suppliers when required to participate in these programmes. This is considered further in Section 4.3 below.

Metric for Dividing the ECO Between Suppliers

In a competitive energy market, energy suppliers are expected to pass on costs in the way they are levied. This means they are expected to pass on a standing charge to each customer account if the obligation is allocated on the basis of customer accounts, and a charge per unit of energy if allocated on an energy supplied basis. There are a number of possible metrics for dividing the ECO, including:

- Option 1: Dividing the ECO on the basis of the number of customer accounts
- Option 2: Dividing the ECO on the basis of kWh of energy supplied
- Option 3: Dividing the ECO on the basis of kWh of energy supplied, with half of the obligation allocated on gas supplied and half on electricity supplied

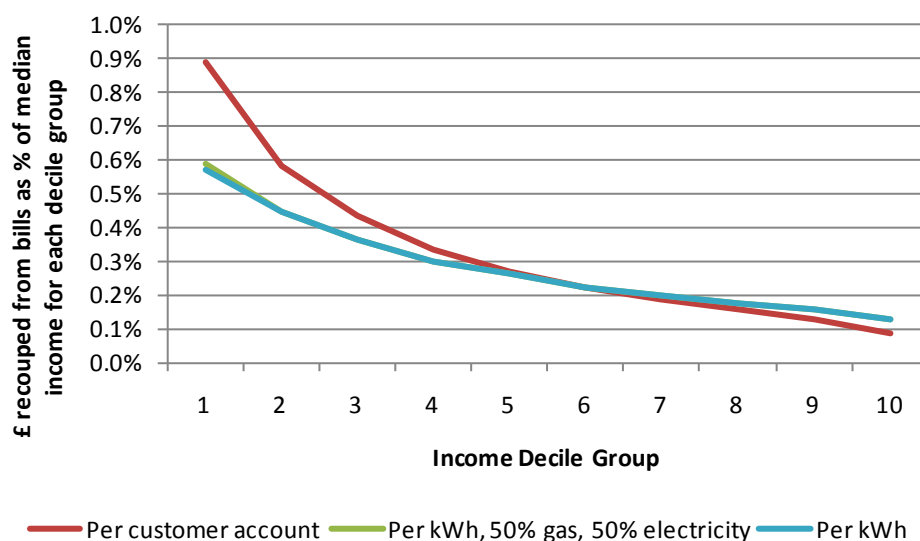
Options 2 and 3 provide a greater incentive to consumers to conserve energy than Option 1. This is because a fixed charge per customer affects the cost of connecting to energy supply, whilst an additional charge per unit of energy consumed would affect the *marginal* cost of energy use, which makes consuming *more* energy more expensive. Option 3 puts a higher marginal cost on electricity use and a lower marginal cost on gas use relative to Option 2 as the total amount of gas supplied is several times larger than the amount of electricity supplied in GB.

Option 2 and 3 would also tend to be less regressive than Option 1 in terms of the distributional impact of the cost pass through as households with higher incomes tend to use more energy. In general, low-income households would benefit from lower energy bills, although there are a number of low-income, high-usage households that would see higher energy costs under Options 2 and 3. The general impact across income groups is illustrated below. This is based on average energy consumption and income data from a CSE report to Ofgem¹⁸⁰.

¹⁷⁹ <http://www.decc.gov.uk/en/content/cms/consultations/threshold/threshold.aspx>

¹⁸⁰ White, V., Roberts, S. and Preston, I. (2011). *Understanding 'High Use Low Income' Energy Consumers*, final report to Ofgem. See http://www.ofgem.gov.uk/Sustainability/Cp/CF/Documents1/High%20use%20low%20income%20energy%20consumers_Final%20Report%20Nov%2010.pdf

Figure 44 Distributional impact of cost pass through across income decile groups as a percentage of median income, by approach



The impact on fuel poverty of the different options is mixed. The fuel poor tend to have the highest notional energy requirements and, as such, Options 2 and 3 (which increase the unit price of energy) will tend to increase the notional energy costs for the fuel poor by a greater extent than Option 1. Allocating the ECO on a per kWh basis is likely, therefore, to make it more difficult to remove these households from fuel poverty.

Given this assessment, the Government has chosen to divide the ECO on the basis of kWh of energy supplied, with half of the obligation allocated on gas supplied and half on electricity supplied (Option 3). This is expected to be less regressive than the historical approach of allocating supplier obligations on the basis of customer accounts, whilst not significantly altering the relative size of obligation gas and electricity suppliers face.

Tapering the Obligation

Whilst a threshold provides a regulatory advantage by shielding small suppliers from having to meet the ECO, it introduces a possible “cliff-edge” effect. Signing up just one additional customer could take a company from having no obligation at all to having a sizeable obligation based upon their energy supply to 250,001 customers.

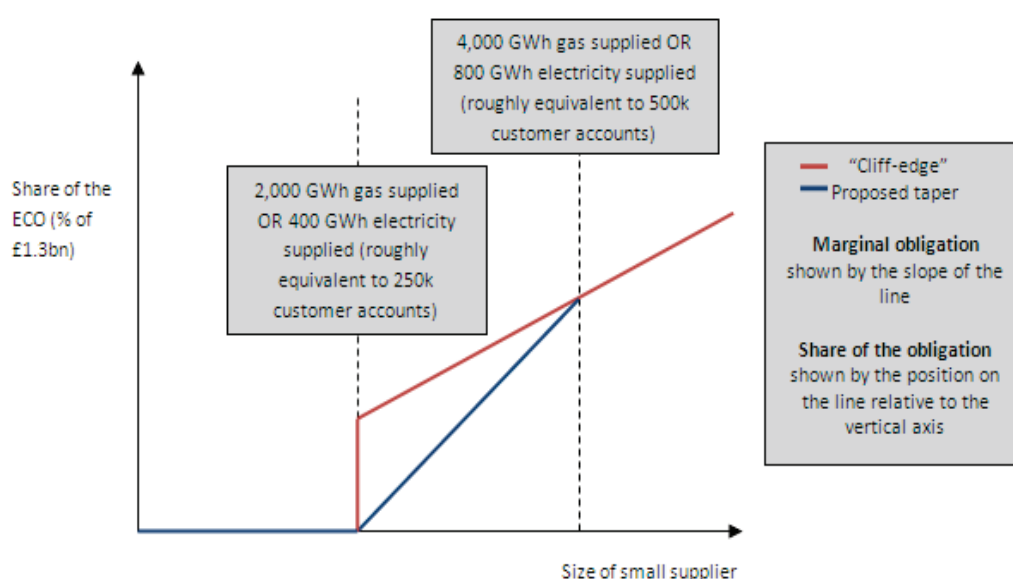
In addition to facing the high *marginal* obligation cost in the form of the carbon and bill savings they need to generate by promoting the installation of measures to meet their share of the ECO, obligated companies would also incur *fixed* costs associated with setting up systems to monitor and deliver the ECO. For a smaller supplier these *fixed* costs would be spread over fewer customers than for a large supplier. This could represent a severe disincentive to companies to take on the extra customers which would see them passing the threshold.

The consultation IA considered the option of exempting the energy supplied to the first 250,000 customer accounts of each supplier from the allocation calculation to alleviate this cliff-edge effect

for small suppliers. However, this would reduce the energy supply base over which the obligation is calculated and, in turn, increase the marginal obligation cost for all obligated companies. This would lead to higher costs being passed onto consumer bills (around 4% higher per customer account).

Therefore, the Government has chosen an alternative method for tapering the obligation. This is illustrated below and is shown relative to the “cliff-edge” option described above. In effect the tapering approach will involve a supplier receiving zero “points” for their first 400 GWh of electricity supply or 2,000 GWh of gas supply, two “points” for their second 400 GWh electricity or 2,000 GWh gas supply and one “point” for all supply above 4,000 GWh of gas or 800 GWh electricity¹⁸¹. The share of the obligation for each supplier will then be the proportion of “points” they have.

Figure 45 Share of the obligation for a small supplier participating in the ECO



Brokerage

The ECO and Green Deal finance markets are expected to be closely interlinked. Given that a large number of expensive measures such as SWI will require ECO subsidy as well as Green Deal finance, the small number of energy suppliers who will be responsible for fulfilling the ECO could have a large influence on the Green Deal and ECO market.

Whilst it is difficult to predict how energy companies will operate in order to meet their obligation, there is a risk that they will behave in ways which limit competition in the Green Deal provider market, which could increase the costs of meeting the ECO in the long run. In particular, energy companies may channel ECO spending through their own Green Deal provider business to gain market share or only partner with a few large Green Deal providers.

¹⁸¹ These figures are based on data published by Ofgem which suggests the typical household consumes 16,500kWh energy using gas as a fuel source and 3,300kWh using electricity and would be recalculated periodically by the ECO administrator. See www.ofgem.gov.uk%2FMedia%2FFactSheets%2FDocuments1%2Fdomestic%2520energy%2520consump%2520fig%2520FS.pdf&ei=0JktT4TXLKnE0QX39I2tCA&usq=AFQjCNH7N3NHxb1yUy_stO9zLif5fT6Urg.

The Green Deal and ECO consultation set out Government's preferred approach of setting up a market based mechanism – a brokerage – to provide a fair and transparent mechanism to allow Green Deal providers access to ECO spending. Government is currently working with stakeholders and industry experts to design the brokerage such that it is attractive to all market players, helping to minimise the cost associated with meeting the ECO. Brokerage will be the subject of a further consultation in Summer 2012.

Scoring of Boiler Repairs for Affordable Warmth Obligation

We consulted on the question of whether to include boiler repairs within the Affordable Warmth obligation. The inclusion of boiler repairs would allow for non-working boilers to be fixed where it is cost-effective to do so (rather than installing a more costly replacement boiler). However, the inclusion of boiler repairs would introduce the risk of large amounts of AW compliance being achieved through essentially very low cost repairs (which could imply a significant level of deadweight).

In order to ensure that savings from repairs are realised, we are proposing that repairs can only be carried out under the following conditions:

- Repairs are limited to A and B rated boilers
- Repairs require a warranty of one or two years and will score accordingly (i.e. a boiler that is repaired and which comes with a one-year warranty will score one year's worth of notional heating cost reduction)
- An overall limit will be set on the proportion of the Affordable Warmth obligation target that can be met by boiler repairs. This will be set at 5% of the overall AW target.

We will continue to monitor activity in this area, which will inform the design of the next phase of the ECO.

Household Eligibility for Affordable Warmth support

The consultation set out a number of options for qualifying criteria for support under the Affordable Warmth target, based on combinations of receipt of means-tested benefits and associated disability premiums,¹⁸² and living in private tenure. These criteria also included elements of restrictions on dependent's ages. Respondents to the consultation largely agreed with the use of means-tested benefits to set the qualifying criteria, and there was general support for expanding the size of the eligible group. The consultation also asked for views on the inclusion of Working Tax Credit as an additional qualifying benefit, and the possibility of raising the age restrictions on dependents.

¹⁸² Specifically, people who are in receipt of state Pension Credit, Child Tax Credit under the 'free school meals' income threshold, or people in receipt of either Income Support, Income Related Employment and Support Allowance (if receiving the work-related activity or support component), Income Based Jobseeker's Allowance and at least one of the following: parental responsibility for a child under the age of 5 who ordinarily resides with the person, child tax credit which includes a disability or severe disability element, a disabled child premium, a disability premium, enhanced disability premium or severe disability premium, a pension premium, higher pension premium or enhanced pensioner premium.

Drawing on data from the English Housing Survey, analysis of the prevalence of fuel poverty in low income households living in both private and social tenures shows a much higher concentration of fuel poor households in private tenure.

Fuel Poverty rates in low income households, by tenure in England, 2009

Group	Number of Non-Fuel Poor Households (mn)	Number of Fuel Poor Households (mn)	All Households (mn)	% Fuel Poor
Private Tenure Income <£16k	2.4	3.3	5.6	59%
Social Tenure Income <£16k	1.8	0.8	2.6	34%

Source: English Housing Survey (2009)

Further analysis of the prevalence of low energy efficiency among low income households within the two tenures shows a significantly greater concentration of inefficient housing (using an inefficiency threshold of SAP 55) in private housing compared to the social sector.

Proportion of dwellings below SAP 55, by tenure in England, 2009

Group	All Households (mn)	Number of households below SAP55	% of households below SAP55
Private Tenure Income <£16k	5.6	3.3	58%
Social Tenure Income <£16k	2.6	0.6	24%

Source: English Housing Survey (2009)

We have therefore decided to proceed with the proposal in the consultation to focus eligibility for Affordable Warmth on private tenure only.

Two options are under consideration in relation to the qualifying benefits for Affordable Warmth:

Option 1: Consultation Proposal: Adopt the eligibility criteria proposed in the consultation.

Option 2: Expand the eligible group: include those claiming Working Tax Credit (under an income threshold of £16,000) and raise the qualifying age threshold for dependent children from 5 to 19 (if in full time education).

Analysis of the two options indicates that including Working Tax Credit and raising the age threshold for dependent children increases the number of eligible households significantly by 4% (or around 100,000 households), without having a material impact on the focus of effort on those in fuel poverty (the Fuel Poverty 'Hit Rate').

Total Number of Households and Fuel Poverty Hite Rates for AW eligibility options

Group	Total Number of Households (GB)	Fuel Poverty Hit Rate
Option 1	2.6m	55%
Option 2	2.7m (+4%)	53%

As a result, Government has decided to expand the eligible group to include those households claiming certain benefits who also have children under the age of sixteen or up to 19 years old if in

‘non-advanced’ education as well as those on working tax credit who meet other caring, disability or age criteria.

We estimate that as a result opportunities are now 2.2 million insulation measures and 1.7 million heating measures over the policy lifetime.¹⁸³

Target Metrics

Using a SAP-based scoring methodology

In the consultation we proposed using a SAP-based scoring methodology to calculate savings made through the installation of measures under ECO, both in terms of carbon savings and notional expenditure. Currently under CERT, carbon savings are calculated using the BREDEM model. This provides a set of reference circumstances for each measure based on typical savings which do not take into account the specific details of each property.

Under the ECO we are expecting a range of more significant and expensive interventions to be delivered and we would expect that the impact of these measures on carbon emissions would vary significantly from house to house. There is therefore an argument for the ECO to use a property-specific assessment using the same SAP-based methodology and assessor accreditation standards as used for the Green Deal. This approach will ensure consistency between the ECO and Green Deal. As ECO measures will in general be long lasting, calculations should be based on standard occupancy patterns rather than attempting to take specific household circumstances into account.

Life-time versus annual scoring

The consultation asked for views on whether targets and scores for the ECO carbon saving obligation should be expressed on the basis of the annualised or the lifetime savings of measures.

The SAP-target scoring methodology generates projected savings on an annualised basis. However, there are advantages for the Carbon and Affordable Warmth objectives in terms of helping to ensure the delivery of the most cost-effective measures in factoring in the expected lifetime of measures. This would align the scores measures received as closely as possible to the extent to which these measures contribute to the policy outcome of reducing annual carbon emissions or fuel bills.

The final policy decision is for ECO measures under the three obligations to be scored on a lifetime basis. A unit of CO₂ saving from a Cavity Wall Insulation with an assumed lifetime of 42 years would therefore generate [1 unit of CO₂ x 42 years] units of delivery towards their carbon target. For the purpose of the modelling, it has been assumed that 1tCO₂ lifetime carbon saving from the installation of an eligible insulation measure generates 1 ECO carbon target point. Progress towards AW targets (ECO AW points) are estimated by multiplying the SAP-based notional reduction in space and water heating costs in year 1 from heating and insulation measures by the estimated lifetime of measures, to generate a lifetime notional heating cost reduction. For example, a 1 unit £ reduction in notional space and water heating costs from a new heating system with an assumed lifetime of 12

¹⁸³ Since the consultation analysis of the eligible group, our estimate of the size of the proposed AW group is smaller than previously estimated. This is a result of improved techniques in correcting for the underreporting of benefits in the English Housing Survey, which allows more accurate matching of those in receipt of multiple benefits.

years would generate [1 unit £ cost reduction x 42 years] = 42 ECO AW points.¹⁸⁴ The detailed lifetime assumptions for both heating and insulation measures are provided in Table 58.

¹⁸⁴ The exception to this rule is when replacing broken boilers in Affordable Warmth eligible households. In such instances, the broken boiler (which the SAP methodology would treat as functional) will be treated as absent and the new replacement boiler would be assumed to be replacing electric secondary heating.

Annex I: Interest Rates

The interest rate affects how much finance can be raised and the total cost the consumer must repay. For example, for a £500 measure repaid over five years, interest payments at 7.5% would total about £120, whereas at 10% the interest component would be around £160 and annual bill savings would need to be £8 higher to meet the Golden Rule.

The interest rate breaks down into three parts. First, the lender has their own funding cost: the cost at which they can obtain the money to lend. A margin is then added, called the credit risk premium, to cover the expected losses from the loan book as a whole. Finally there is a residual cost, made up of the lender's profit margin and any loan administration costs.

To minimise these costs, Green Deal providers are exploring options to aggregate Green Deals into a Special Purpose Vehicle (SPV). The vehicle would raise capital from investors to fund Green Deals and repay this using the Green Deal repayments. This has several advantages:

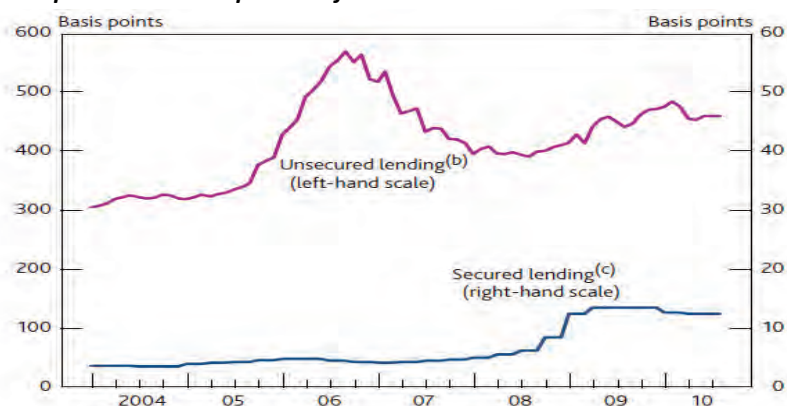
- It should minimise funding costs. The cheapest sources of long-term debt finance is found in the capital markets. In order to cost effectively access the capital markets, sufficient scale is required. By aggregating Green Deals into an SPV, that scale can be achieved and consumers should ultimately benefit through a lower interest rate.
- Aggregation should also minimise residual costs. Green Deals may have long repayment periods so admin costs could be significant. By achieving funding at scale, overheads per loan are reduced.
- For each Green Deal someone must provide the funding for it. The aggregator SPV described above means providers need not do this. As such, providers thinking of entering the Green Deal market, who are unlikely to be in the business of finance, will not be put off by having to carry the funding liability on balance sheet.

However, the aggregator cannot improve the credit risk of the underlying Green Deals. The risk might be expected to be small as charges will be attached to electricity bills where default loss is low (1.5%-2%). The Green Deal's novel aspects mean default rates may not be identical to those on fuel bills (see box on defaults below). As such, the market is likely to take a conservative view until there is a track record. To mitigate this, the possibility of obtaining investment from the Green Investment Bank (GIB), during that start-up period, is being explored. Green Deal is a stated early priority for the GIB.

Independent analysis suggests that an interest rate of 6-8% is possible, depending on the level of GIB investment and on a suitable aggregation structure being agreed. The most developed potential aggregator, called The Green Deal Finance Company, has a central estimate of 7.4%. We therefore use 7.5% as a central rate in our modelling, with a low rate of 6.5% and a high rate of 9.5%. The latter reflects the contingency that an aggregator SPV does not come into being as anticipated and hence providers have to fund Green Deals on their own balance sheet.

Default expectations determine credit risk and hence will be a crucial component of the final Green Deal interest rate. Three factors determine the exact relationship: default probability, loss given default and the correlation of defaults over time. Green Deal defaults should be similar to those on energy bills as the charge is attached to the electricity meter and ranks *pari passu*, meaning suppliers have as much incentive to collect it as they do the rest of the bill. Data suggests energy bill default loss is about 1.5%-2% of revenue. If the Green Deal is similar, this would be a low rate for an unsecured credit product, equivalent to 150-200 basis points on the chart below:

Expected Loss Component of Credit Risk



Source: <http://www.bankofengland.co.uk/publications/quarterlybulletin/qb100301.pdf>

(b) Expected loss for personal loans – all products.

(c) Expected loss for 75% loan-to-value mortgages – all products.

So, based on the credit risk of current energy bills, we might expect the Green Deal to have an interest rate somewhere between the rates for secured and unsecured lending above. Bank of England data puts these rates at about 4% for secured lending (5-year 75% loan-to-value mortgages) and 15% for unsecured lending (the average rate on personal loans of £5,000). However, until the Green Deal establishes a default track record to this effect, the market cannot use energy bill defaults as a direct proxy for Green Deal defaults and will hence price the risk more highly. This is why GIB investment is being sought; to keep the interest rate at the level it is likely to be once track record is proven. The reasons for market uncertainty are listed below.

- Adverse selection.** Green Deals may be offered at the same rate to all, meaning they may be most attractive to those without access to superior forms of credit. Without scale, the Green Deal could thus have a lower average credit rating and a higher default probability than for the entire population with energy bills.
- Performance of measures.** Unlike provision of energy generally, Green Deal payment will rest on the customer's view that the product is performing to standard, creating an extra risk – though the *pari passu* provision will mean they cannot pay only the energy element of the bill.
- Void Periods.** Whilst the current bill payer always remains liable for payment of the charge, Green Deal repayments may be interrupted by void periods, particularly in the private rented sector.
- Disclosure.** The charge may be written off in some cases if not properly disclosed on change of ownership.
- Early Repayments:** Early repayment reduces the cash-flow due to early termination of the plan.
- Electricity Bill vs Gas Bill.** Most bill savings accrue through gas bills, so customers not on dual fuel packages may see their electricity bills increase.

Annex J: Green Deal Eligible Measures

We asked consultees for views on which measures should be added to the list of Green Deal Eligible measures with particular relevance to non domestic buildings. An additional 13 measures were added. Certain measures will not be recommended for different types of buildings, as they are not appropriate or are not modelled in the appropriate methodology (SBEM or SAP).

A statutory instrument will set out a final list of the qualifying measures. Below is a current draft list:

- Air source heat pumps
- Biomass boilers
- Biomass room heaters (including with radiators)
- Cavity wall insulation
- Cylinder thermostats
- Draught proofing
- Duct insulation
- Hot water showers
- Hot water systems
- Hot water taps
- External wall insulation systems
- Fan-assisted replacement storage heaters
- Flue gas heat recovery devices
- Ground source heat pumps
- Heating controls (for wet central heating system and warm air system)
- Heating ventilation and air-conditioning controls (including zoning controls)
- High performance external doors
- Hot water controls (including timers and temperature control)
- Hot water cylinder insulation
- Internal wall insulation (of external walls) systems
- Lighting systems, fittings and controls (including rooflights, lamps and luminaires)
- Loft or rafter insulation (including loft hatch insulation)
- Mechanical ventilation with heat recovery
- Micro combined heat and power
- Micro wind generation
- Pipe-work insulation
- Photovoltaics
- Chillers
- Gas-fired condensing boilers
- Replacement glazing
- Oil-fired condensing boilers
- Warm-air units
- Radiant heating
- Roof insulation
- Room in roof insulation

Sealing improvements (including duct sealing)
Secondary glazing
Solar water heating
Solar blinds, shutters and shading devices
Transpired solar collectors
Under-floor heating
Under-floor insulation
Variable speed drives for fans and pumps
Waste water heat recovery devices attached to showers
Water source heat pumps

Annex K: Post Implementation Review

A Post Implementation Review (PIR) should examine the extent to which the implemented regulations have achieved their objectives; it should also assess their costs and benefits and identify whether they are having any unintended consequences. As such, the PIR Plan is detailed below.

Basis of the review:

Given the innovation in the Green Deal/ECO policy framework and the inevitable uncertainty which comes with this, there is a strong commitment to monitoring and evaluation. Understanding what works, by how much, and why, will be important if government (and the market) is to be able to refine these policies over time.

The details of this process will be set out in the Green Deal and ECO Monitoring and Evaluation Strategy, to be produced in Spring 2012.

Longer-term, the key concern will be the impact of the Green Deal and ECO in terms of carbon and/or energy (and associated bill) reductions. But in the short term, we will be equally interested in how the supply and delivery chain is engaging with the Green Deal and ECO framework, and how the framework is supporting this.

This suggests 3-4 milestone reporting points, in addition to regular statistical output and monitoring:

- pre-launch during 2012 (baseline)
- immediate period post-launch (“one-year on”, end-2013 to mid-2014); and
- medium to long-term after launch (3 and 5 year reviews)

Review objectives:

The review process has two broad aims: to examine the implementation and *process* of the policy framework so that any necessary improvements can be made quickly and with sufficient evidential support; and to measure the *impact* of the policy framework against pre-agreed objectives:

- To create a market framework removing financial and quality assurance barriers for consumers, and allowing for new entrants into the market for energy efficiency in housing and non-domestic buildings;
- To remove barriers to the supply of private finance to this market framework, including ensuring market confidence that there will be sufficient scale of demand to enable efficient financing in the first two years of Green Deal;
- To ensure ECO delivers cost effective carbon abatement in the housing sector in the second and third carbon budget periods.

It is expected that early monitoring and evaluation is likely to focus on process and later reviews will consist more of impact evaluation, though key indicators will be monitored throughout.

Review approach and rationale:

There will be different types of monitoring and evaluation required at each stage of implementation pre and post launch. We anticipate that a range of methods will be deployed. For process evaluation, the following techniques are likely to apply:

- Ongoing monitoring of key indicators (number of Green Deals, total investment made, resulting carbon reduction, bill payments, price of ECO points etc)
- Omnibus Surveys to monitor general consumer awareness and attitudes to desirability and process of Green Deal
- Bespoke surveys of participants, such as Green Deal assessors and Installers
- Qualitative focus group work
- Process evaluation studies of different parts of the delivery chain, to understand in depth how these participants are planning/carrying out delivery
- Baseline and follow-up studies for particular sectors
- Researchers could also be deployed to assess training and development activity, or to map the processes being developed by participants

For impact evaluation, the above techniques are likely to be supplemented by:

- The construction of a robust counterfactual using bespoke survey data and/or statistical techniques as set out in the Magenta Book
- Statistical/econometric analysis of data to assess performance relative to counterfactual
- Technical monitoring of the performance of individual measures and packages in-situ, post-installation to verify that estimated energy and carbon savings match actual savings
- Further data analysis to determine distributional impacts.
- Cost-benefit analysis.

Baseline:

As set out above, considerable analysis will be conducted to establish both a robust baseline and counterfactual i.e. an estimation of how the baseline would progress in the absence of the policy. By measuring against these, performance can then be attributed to the policy framework with some confidence.

Baseline and counterfactual levels will be investigated in a number of areas, using the techniques set out above. These include:

- The number of measures installed and hence estimated carbon reduction
- Amount of energy efficiency investment
- Bill payments
- The state of the energy efficiency market (including job levels)
- The value of energy efficiency products within house prices/rental values
- Consumer attitudes (e.g. trust of installers, general attitudes to energy efficiency, finance etc)

Success criteria:

The Green Deal will be a (largely) market financed and market driven offer to consumers and businesses and therefore the policy framework that aims to create this new market is not subject to

any specific targets. The purpose of the review process is to evaluate (cost) effectiveness in general terms.

However, the review will certainly attempt to estimate the policy framework's contribution towards macro-level carbon reduction targets to which the UK is committed. In addition, the nature of the ECO means each energy supplier is committed to provide a specific level of carbon reduction and the review would certainly look to assess any failure in this regard and the reasons behind it.

Monitoring information arrangements:

The aim is to accurately capture hard output data from across the programme, without placing additional burden on participants. The principle will be to "collect once, use many times" and to "harvest" useful data from participants management information.

We have identified the key variables that will require frequent monitoring, which will reflect the full operation of the Green Deal. For example, the

- Number of Green Deal Providers; Assessors and Installers;
- Number of assessments and the number of plans taken out (conversion rates);
- Volume of Green Deal finance issued by providers;
- Number of measures installed;
- Number of complaints and what these relate to.

We are developing a reporting template for consultation with key stakeholders, which will also consider regularity of reporting and the intended audience. The requirements and application of the Data Protection Act in the context of the Green Deal have been identified and work is on-going within DECC to ensure that the Department is fully compliant.

Data will be collected at an individual household level, so we will be able to monitor and report at various levels of geography, potentially down to Lower Level Super Output Area (approx 400 households in each area). For regular monitoring reports it is envisaged that data will be published at a higher level geography, to ensure the information is easy to digest.

The key data sources will be:

- Management information from Energy Efficiency Advice Service
- The EPC Register and Database (Landmark)
- Green Deal Central Charge Database
- National Energy Efficiency Database
- Data from the Registration and Oversight Body
- Data from the ECO Administrator
- Complaints data from the Redress scheme
- English Housing Survey, Scottish Housing Condition Survey, Living in Wales Survey.
- Digest of United Kingdom Energy Statistics (DUKES)

Reasons for not planning a review:

N/A

Annex L: Subsidy Research Summary

Context

Research was undertaken to investigate whether a high rate of subsidy has a proportionally larger impact on consumer uptake of the Green Deal.

The purpose of the research was to determine peoples' preference for a home improvement package of cavity wall insulation or solid wall insulation (depending on which they needed) given different levels of subsidy (and corresponding net bill savings).

Methodology

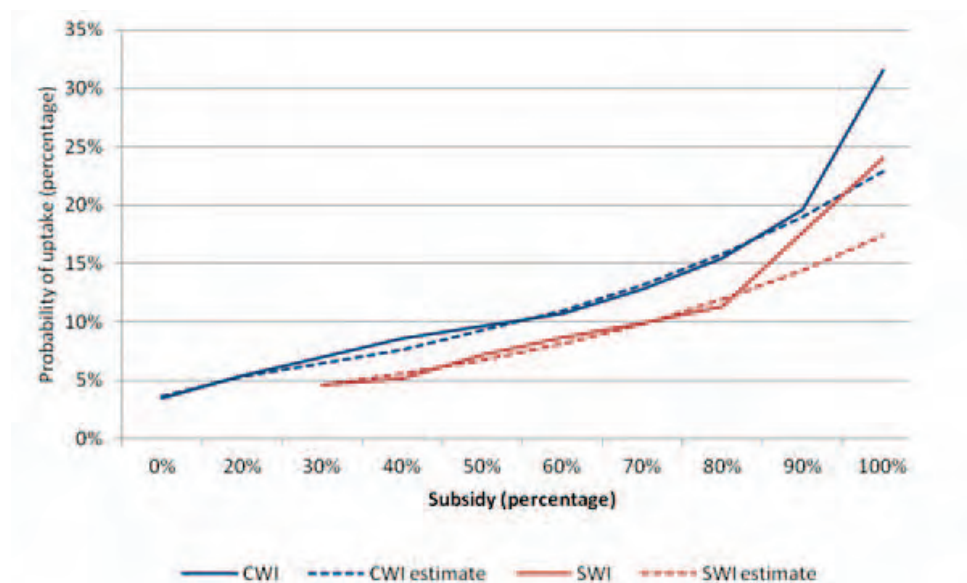
A series of questions were included on GfK NOP's weekly Random Location Omnibus (RLO). It is designed to be representative of the population in terms of age, sex, social class and region. Interviews were conducted face to face in respondents' homes using Computer Assisted Personal Interviewing (CAPI) . Only owner occupiers and private rented tenants were included in the research.

Respondents who needed either cavity wall insulation or solid wall insulation were given information about the Green Deal and asked, at a series of varying subsidies and annual bill savings, how likely they would be to take up the product at each of the subsidy levels. The order in which subsidy levels were shown was randomised to avoid any bias and order effect. The method is a standard pricing technique known as Gabor-Granger.

Fieldwork took place in November 2011. A total of 1,946 people were interviewed in the omnibus survey. However, some were removed from the sample because they were not suitable, e.g. they did not own their property or rent from a private landlord etc. This resulted in a final sample of 1,095 respondents answering the preference questions.

Findings

Figure 46: Relationship between subsidy rates and consumer demand for insulation measures



The results are shown in the figure above. The dotted lines show the estimate of uptake based on original survey data generated from the 2011 Green Deal consumer survey, and the solid lines show uptake based on this survey. The difference between the dotted lines and the solid lines indicate that, a higher rate of subsidy does have an impact on uptake for the two measures tested - cavity wall insulation and solid wall insulation, according to the survey.

The results were compared with a prediction based on the lower rates of subsidy and this information was used in the Green Deal Household Model. Further explanation of this is provided in Annex B.

Annex M: Funding Home Improvement Research Summary

Context

The purpose of the research was to provide an indication of the sources of funding that consumers have used and might choose to use in the future for funding home improvements. This information was used to inform the low Green Deal finance scenario in the modelling. There are a number of caveats to note with this research:

1. Questions were not set in the context of the Green Deal, nor set in the context of real financial alternatives. Decisions were made by customers in the absence of any information on the availability of Green Deal finance and its benefits.
2. Respondents were asked questions about making general 'improvements to their home' rather than focusing specifically on energy efficiency improvements.

Methodology

A series of questions were included in GfK NOP's weekly Random Location Omnibus (RLO). It is designed to be representative of the population in terms of age, sex, social class and region. Interviews were conducted face to face in respondents' homes using Computer Assisted Personal Interviewing (CAPI). Only owner occupiers and private rented tenants were included in the research.

Fieldwork took place in February 2012. A total of 1,880 interviews were interviewed in the omnibus survey. Full interviews were only conducted with those who owned or rented their property and were responsible or jointly responsible for financial decision making in the household. This resulted in a final sample of 1,087 people.

Findings

When respondents were asked about all the things they had done to their property in the last 12 months, 41% of people had made some form of home improvement, and 18% of people had installed one or more energy efficiency measure(s). 59% of respondents had made no form of improvements to their home in the last 12 months.

Of those who had done anything to their property in the last 12 months (general home improvements or energy efficiency measures), the majority of people (83%) paid for the improvements upfront e.g. via savings. 13% of people used a form of finance (e.g. a loan), 3% used part financing (i.e. some finance, some upfront) and 5% used another method of payment (e.g. someone else paid for it).

When asked to consider a hypothetical purchase for home improvements of £500, only 9% said they would use finance. This rose to 20% when the cost was £2,000 and to 30% when the cost was £5,000. These results are broadly consistent with other UK and US evidence.

DRAFT REGULATORY IMPACT ASSESSMENT

Annex B – Department for Communities and Local Government, Changes to the Conditions of Authorisation for Building Regulations Competent Person Self-certification Schemes Final impact assessment



Changes to the Conditions of Authorisation for Building Regulations Competent Person Self- certification Schemes

Final impact assessment





Changes to the Conditions of Authorisation for Building Regulations Competent Person Self- certification Schemes

Final impact assessment

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June 2012

ISBN: 978-1-4098-3432-8

Title: Changes to the conditions of authorisation for Building Regulations competent person self-certification schemes IA No: DCLG 12010 Lead department or agency: Department for Communities and Local Government (DCLG) Other departments or agencies:	Date: 22 February 2012 Stage: Final Source of intervention: Domestic Type of measure: Other Contact for enquiries: Ian Drummond (0303 444 1791) or Kevin Flanagan (0303 444 1809)
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Summary: Intervention and Options

RPC Opinion: AMBER

Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, Measure qualifies as One-Out?
£.37.0m	£40.3m	-£4.4m	Yes Out

What is the problem under consideration? Why is government intervention necessary?

DCLG proposes to make changes to the administrative conditions of authorisation for the operation of Building Regulations competent person self-certification schemes in England. The changes proposed are designed to address perceived weaknesses in the current system. Currently there is a lack of consistency which has arisen from the gradual evolution of competent person schemes to cover different types of building work, meaning the Department has set different conditions for similar schemes which has led to confusion and an uneven competitive playing field. There is also evidence that compliance with the Building Regulations could be improved. Self-certification, through competent person schemes, is an appropriate response to market failure in a situation where information is costly and difficult to obtain. However, these schemes need to be governed effectively and consistently to help ensure there is compliance.

What are the policy objectives and the intended effects?

The objectives are to provide a single set of clear and more robust conditions of authorisation for all competent person schemes to work to and be assessed against. This will enable schemes to work in a more structured way, resulting in more consistency and transparency in the system, better services to the consumer and a competitive level playing field across the schemes. The proposed revised conditions will also help improve the level of compliance with the Building Regulations, provide a higher level of quality assurance and align competent person schemes more closely with the Green Deal initiative making it easier for it to be delivered.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

The options considered are to

- (1) do nothing and retain the current conditions of authorisation; or
 - (2) introduce a new set of conditions of authorisation to meet the policy objectives identified above.
- The Department prefers option 2 as if we do not introduce these conditions, inconsistencies between schemes will continue, causing confusion within the relevant industries, to members and consumers; the lack of compliance by some schemes with the current conditions and the Building Regulations will not be addressed; and the successful introduction of the Green Deal will be made more difficult.

Will the policy be reviewed? It will be reviewed. If applicable, set review date: Month/Year

Does implementation go beyond minimum EU requirements?			No		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	Micro Yes	< 20 Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded: n/a	Non-traded: n/a	

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: _____

Andrew Stunell

Date: 22 February 2012

Summary: Analysis & Evidence

Policy Option 2

Description: Changes to the conditions of authorisation for Building Regulations competent persons schemes

FULL ECONOMIC ASSESSMENT

Price Base Year 2011	PV Base Year 2012	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 18.9	High: 51.0	Best Estimate: 37.0

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	£3.3m	£3.1m	£29.6m
High	£7.2m	£4.1m	£42.3m
Best Estimate	£5.2m	£3.4m	£34.2m

Description and scale of key monetised costs by 'main affected groups'

Main costs are from continuing training (£22,310,000), cost of financial protection (£3,700,000), action to increase membership (£1,610,000), ensuring minimum technical competences (£3,800,000), surveillance (£1,570,000), UKAS accreditation (£830,000), other actions (£360,000 – see table on page 8). Most of these costs will fall on the competent persons schemes themselves although £57,000 of the costs will be picked up by government.

Other key non-monetised costs by 'main affected groups'

All main costs involved in these changes have been monetised.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	-	£7.1m	£61.2m
High	-	£9.4m	£80.6m
Best Estimate	-	£8.3m	£71.2m

Description and scale of key monetised benefits by 'main affected groups'

The primary benefit (£70,930,000) from the package of changes will be through a new surveillance/inspection regime which will ensure a more efficient, effective, risk-based governance regime while requiring fewer inspections. There is also a small benefit from the current monitoring regime being replaced by UKAS accreditation (£250,000).

Other key non-monetised benefits by 'main affected groups'

Many of the measures in this policy contribute to the functioning of a more effective governance regime while requiring less surveillance through risk-based inspections. This benefit is monetised only in the surveillance section, to avoid double counting, with sensitivity undertaken to reflect uncertainty. Some additional benefits have been identified, e.g. a better skilled workforce and greater customer satisfaction, improving compliance with the Building Regulations and more transparency. These have not been monetised.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

A number of high and low estimates have been made and sensitivity testing undertaken to reflect uncertainty. For instance, estimates have been made of the proportion of members in schemes who would require annual inspections and the proportion which can be brought into the proposed three-yearly inspection regime. Details of these can be found on pages 27-28.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m: (2011 prices)			In scope of OIOO?	Measure qualifies as
Costs: 3.6m	Benefits: 8.2m	Net Benefit: 4.7m	Yes	OUT

Evidence Base (for summary sheets)

Background

The Building Regulations and development of competent person schemes

The Building Regulations (currently the Building Regulations 2010, as amended) set minimum standards primarily for the design and construction of buildings and the provision or extension of controlled services or fittings in buildings, for the purposes of the health and safety of people, energy efficiency and accessibility. Until 2002, anyone carrying out building work was required to use a building control service provided by a building control body, i.e. local authorities or private sector approved inspectors, to check plans and/or inspect work to help ensure compliance with the applicable requirements of the Building Regulations. Building control bodies levy charges for the use of their services.

By the late 1990's the significant increase in the amount and types of building work subject to the Building Regulations that had to be notified to a building control body for checking could no longer be practicably accommodated within the traditional building control framework. The 1991 Building Regulations had already exempted the installation of heat-producing gas appliances from notification to local authorities where the work was carried out by an installer registered with the CORGI (Council for Registered Gas Installers) registration scheme approved under the Gas Safety (Installation and Use) Regulations.

A formal public consultation in 1997 on the general principle of allowing installers (i.e. businesses, mostly sole traders/small firms) assessed as competent to self-certify that their work complied with the relevant requirements of the Building Regulations showed general support. In 1999 the Department consulted more specifically on the appropriateness of self-certification for whole buildings and/or specific types of work. There was no support for self-certification of compliance for whole buildings but much support for specific types of work, provided that the type of work was of relatively low incidence of risk to health and safety or sustainability and of such a high volume that made building control involvement difficult, diverting resources from areas of higher risk. However, progress in taking forward the proposal was initially slow.

In April 2002 the revision to Part L (Conservation of fuel and power) extended Building Regulations requirements to areas not previously covered, notably the energy efficiency of replacement glazing and combustion appliances. It was anticipated that for each type of installation there would have been over one million notifiable jobs per year, which would considerably stretch building control resources. It was also considered that the incidence of risk associated with non-compliance was low. It was therefore decided that self-certification would be appropriate in these areas and a number of schemes - known as *competent person schemes* - were introduced. Within this the role of CORGI was extended to the energy efficiency of heat-producing gas appliances and two new schemes were authorised for the installation of oil-fired and solid fuel appliances, operated by OFTEC and HETAS respectively. FENSA was also authorised to allow self-certification of replacement glazing in dwellings by its registered installers.

OFTEC and HETAS had been successfully operating voluntary installer schemes for some years before authorisation and at the time it was considered unnecessary to impose any conditions of authorisation on them. FENSA was a newly created body and it was decided that two main conditions should be imposed by the Department, i.e. requirements for a surveillance regime to check randomly that installations complied with the Building Regulations and an insurance-backed warranty to protect customers.

When Ministers made the decision in 2004 to regulate electrical installation work in dwellings through Part P of the Building Regulations, it was agreed this could only be practicably implemented if there were competent person schemes in this area. Five full competence and five defined competence (where electrical work was only part of the main activity, e.g. kitchen or gas fitters) schemes were authorised to operate from 1 January 2005.

The schemes authorised in 2004, and subsequently, had to agree to conditions of authorisation (also referred to as 'authorisation criteria' - see Annex B) set by the Department as a prerequisite for authorisation. However, these conditions were not imposed retrospectively on FENSA, HETAS or OFTEC although they have voluntarily brought their operations into line with most of them.

In 2006 Part L of the Building Regulations was revised once again and Articles 3 to 6 of the Energy Performance of Buildings Directive implemented. It was decided that the revised provisions could only be practicably implemented if further competent person schemes were authorised. Following an invitation in 2005, a number of applications were received and approved, for new and to extend existing schemes, covering the plumbing, heating, hot water, mechanical ventilation and air-conditioning sectors.

Since that time the Department has received applications for and authorised new schemes for a number of other types of work, e.g. cold water supply, cavity wall insulation, replacement roofing, microgeneration and renewable technologies, as well as approving extensions for some existing scheme operators. There are currently **18** competent person schemes (there were 12 when the consultation stage Impact Assessment was prepared in 2009) - a full current list can be found in Schedule 3 of the Building Regulations 2010 (as amended) and on the Department's website at:

<http://www.communities.gov.uk/planningandbuilding/buildingregulations/competentpersonsschemes/existingcompetentperson>.

Information provided by scheme operators indicates that about 2.5–3.0 million jobs are currently self-certified under competent person schemes each year, compared to an estimate of around half a million other notifiable jobs in total supervised by building control bodies.

Authorisation and operation of competent person schemes

To become a competent person scheme operator, applicants must demonstrate to the Department, in consultation with other relevant organisations, that they have the managerial, financial and technical ability to operate a self-certification scheme and are able to comply with conditions of authorisation. Authorisation for a new or extended scheme is formally given through an amendment to the Building Regulations. Installers who wish to self-certify must pay a membership fee to join a scheme and demonstrate that they have the necessary skills and technical competence to carry out a type of work to Building Regulations standards and are subject to ongoing monitoring.

There is no requirement that a body should apply for authorisation as a competent person scheme operator. The decision is *voluntary*, based on what advantages and benefits a body considers might accrue to it. Equally, membership of a scheme is *voluntary*; installers who do not wish to join a scheme can continue to use the services of a building control body to check their work.

Rationale for intervention and policy objective

Allowing competent installers who are members of competent person schemes to self-certify their own work as compliant with the Building Regulations means that they are not required to notify in advance and pay a charge to a building control body to check the work. Instead the work is simply notified to the local authority within 30 days of completion for authority records.

This saves time and removes a cost and burden on installers and consumers (i.e. building owners/occupiers) and also on building control bodies as it frees up their resources to concentrate on other areas of building work where the risk is higher and self-certification is not considered appropriate. Enlisting the installers undertaking the work in delivering compliance can help installations achieve a higher level of compliance with the Building Regulations, particularly where the incentives are aligned.

Therefore, self-certification, through competent person schemes, is an appropriate response to market failure where information is costly and difficult to obtain. It provides an alternative, cost effective and deregulatory means of delivering compliance with the Building Regulations and its success is generally evidenced by past monitoring reports (see below). However, these schemes need to be operated and governed effectively and consistently to help ensure that there is compliance.

It has become clear from discussions with competent person scheme operators that there are differences between them on the conditions on which they had been authorised, which some consider to cause confusion and create an uneven competitive playing field both generally and in relation to specific types of work. The lack of consistency arose from the gradual evolution of competent person schemes to cover different types of work as explained above. Decisions taken on an individual basis may have been sensible at the time but led to the situation where the Department was requiring different things from similar schemes.

In addition, the Department has commissioned *ad hoc* monitoring exercises of competent person schemes since they were first introduced in 2002. Although the reports received indicate that most schemes have been operating effectively and have proved to be a success, the latest report in 2009 found that some schemes were not complying fully with their conditions of authorisation or achieving a sufficiently high level of compliance with the Building Regulations. There is also some evidence from local authorities, complaints received by the Department and more recently the Red Tape Challenge website that compliance with the Building Regulations could be improved. The Department considers that these issues need to be addressed to provide a fair basis on which existing schemes can work and new schemes authorised and ensure good administration in the future.

The Department has therefore carried out a review of the administrative provisions for the approval and operation of competent person schemes with the aim of introducing a new set of more robust and transparent standardised conditions of authorisation and to ensure regular monitoring of adherence to the conditions. The Department's proposal to introduce these conditions was initially consulted on informally and developed in working groups consisting of representatives from the schemes, LABC (the body representing local authority building control departments) and the Department. The proposal was also supported by the Building Regulations Advisory Committee (BRAC).

Consultation

The Department published a consultation document *Building Regulations competent person self-certification schemes* in December 2009, which is available on our website at: <http://www.communities.gov.uk/publications/planningandbuilding/competentschemechangesconsult>.

The consultation document described in detail the proposals for a new set of conditions of authorisation for competent person schemes by amending some of the existing conditions and introducing some new ones, the reasons for the proposals and included a consultation Impact Assessment with the estimated costs and benefits of doing so. It also explained the Department's proposal for a more formal and transparent application process.

The Department received 47 responses to its consultation (11 from competent person scheme operators, 10 from building control bodies, 16 from professional or trade bodies and 10 from other various respondents). A clear majority supported each of the proposed new conditions. The responses contained a number of queries and suggestions on how the conditions might be implemented in practice, for example on complaints procedures, surveillance of scheme members and consumer financial protection. Some concerns were also raised by the minority opposed to one or more of the proposed conditions, for example relating to the cost of the requirement for United Kingdom Accreditation Service (UKAS) accreditation - see consideration of responses below. In addition a number of the respondents provided comments on the consultation Impact Assessment which have been taken into account in preparing this final Impact Assessment.

The summary of responses *Building Regulations: Competent person self-certification schemes – Analysis of responses to consultation* is also available on the Department's website at: <http://www.communities.gov.uk/publications/planningandbuilding/competentschemeanalysis>. The *Introduction and overview of responses* section of the report is replicated at **Annex C** of this Impact Assessment for ease of reference.

Consideration of the consultation responses and further developments

Following the public consultation carried out in 2009/10, the Department fully considered all the responses received, in particular those made by competent person scheme operators, and then updated the draft conditions of authorisation as appropriate. The Department recognised that some scheme operators had concerns about the costs of some of the proposed changes, in particular the cost of UKAS accreditation, but, in general, the concerns were not supported by evidence and in the case of UKAS accreditation by a misconception of what it would require.

However, to help allay those concerns, there were a large number of subsequent meetings with scheme operators (about 12 meetings with all the operators present, two sector specific meetings and a number with particular scheme operators) and extensive correspondence to discuss particular issues. The Department has since made some amendments to the conditions and significantly revised the second column to the conditions, i.e. the *Notes on how to demonstrate meeting the conditions*, to set out how we considered that a scheme operator could most easily and at least cost demonstrate compliance with the conditions. As a result the feedback we have received indicates that the scheme operators are now generally content with the proposed new set of conditions of authorisation as they now stand (**Annex A**).

The Department has also had many meetings with UKAS, some with scheme operators present, to discuss the costs and process of UKAS accreditation (condition 1) as some scheme operators in their responses commented that we had underestimated the costs of this in the consultation Impact Assessment. These discussions provided much better evidence as to the costs of applying to UKAS for accreditation, the number of days that UKAS would need to consider an application and for which an applicant would need to pay. These costs are reflected below in the estimate of costs and benefits of condition 1. As the scheme operators are currently engaged in the accreditation process the costs estimated below have turned out to be the actual costs that schemes are currently paying.

The consultation Impact Assessment also anticipated and attributed a present value cost of £20m over ten years to extra inspections needed as a result of UKAS accreditation. However, UKAS has now stated that no extra inspections of the members of schemes will in fact be needed (regular surveillance inspections required under condition 12 are costed below). As no extra inspections are required the cost of £20m has been removed from the final Impact Assessment.

Since the consultation the sector skills bodies have developed (or are developing) National Occupational Standards (NOS) and Minimum Technical Competence (MTC) Standards

documents for all the types of work covered by competent person schemes. These generally reflect the older competence standards used by most of the schemes except for the replacement window schemes where there were previously no available competence standards. With the development of NOS and an MTC for windows the new conditions of authorisation will require all current and future window installers in schemes to have their competence assessed, which was not costed in the consultation Impact Assessment. This has meant a significant increase in the costs of complying with condition 9 from a present value cost of £275,000 to £3.8m over ten years, primarily for the replacement window schemes. .

Since the consultation document was issued there has been an increase in the number of scheme operators from 12 to 18 and within schemes there has been in many cases an increase in the number of members. This means that where costs and benefits are based on the number of schemes or the number of members that multipliers are greater, in some cases magnifying costs and in others benefits, beyond those in the consultation Impact Assessment.

In the consultation document the Department proposed a number of options to provide financial protection to consumers and did not fully cost the options. In line with the Green Deal and the Microgeneration Certification Scheme the Department has subsequently decided that there will be automatic financial protection for all consumers. This also reflects the responses to the consultation where a majority of respondents (including competent person scheme operators) expressed the view that financial protection should be automatic. This means a present value cost of £3.7m over ten years compared to just £10,600 in the consultation Impact Assessment.

Green Deal and Microgeneration Certification Scheme

Since the consultation on the conditions of authorisation was carried out, the Department of Energy and Climate Change (DECC) has decided to implement a new programme (from 1 October 2012), the Green Deal, to encourage greater energy efficiency in existing buildings. The architecture of the parts of the Green Deal dealing with installers (assessment of competence and surveillance of installer's work and UKAS accreditation) is very similar to that of competent person schemes.

As most scheme operators and many of their installers would wish also to participate in the Green Deal to take advantage of the commercial opportunities, the Department considers that it is sensible and practicable to align the conditions of authorisation for competent person schemes as closely as possible to Green Deal requirements in PAS (Publicly Available Specification) 2030 and PAS 2031 and the Green Deal Code of Practice. This will allow scheme operators and installers to derive the benefits of mutual membership meaning that they would need to be assessed only once for both purposes and surveillance would cover both sets of requirements, saving scheme operators and installers unnecessary expense. The Green Deal has therefore had a significant impact on the costs, most notably those of UKAS accreditation, originally identified in the consultation Impact Assessment. All currently authorised competent person schemes except BINDT have applied for Green Deal accreditation. The effects are shown below in the analysis of costs and benefits under condition 1.

The Department is similarly working with DECC to align the competent person scheme framework with the related Microgeneration Certification Scheme (MCS), a quality assurance scheme relating to renewable microgeneration technologies which has also come into being since the consultation. The following six competent person scheme operators are currently UKAS accredited for MCS: Ascertiva, Benchmark, ECA Certification, HETAS, NAPIT and STROMA.

The Green Deal and MCS have adopted the same MTCs and NOS as competent person schemes for the assessment of the competence of installers. A scheme operator would therefore need to undertake only one competence assessment of installers and the assessment would apply across all three schemes (Green Deal, MCS and competent person schemes).

These synergies will make it more convenient and less costly for installers to become registered with the different schemes if appropriate. It will be for each installer to decide whether to become a member of all three schemes. As we have no evidence to estimate the current or likely level of membership take-up of all three schemes, particularly as the Green Deal has not yet launched, the benefit of the synergy cannot be monetised. This Impact Assessment therefore includes all the additional costs of competence assessment.

Options considered

We have considered two options following the consultation exercises referred to above:

Option 1 - To do nothing and retain the current conditions of authorisation.

Option 2 - To take forward the proposed new set of conditions of authorisation in order to create a more robust and transparent framework and address the deficiencies in the current conditions. This will provide more consistency, a competitive level playing field, enhance quality assurance and improve the level of compliance with the Building Regulations. It will also support the successful introduction of the Green Deal.

Proposed changes to the conditions of authorisation

The Department proposes to proceed with option 2 above. The proposed new set of conditions of authorisation (21 in total) for competent person schemes are stated in column 1 of **Annex A** and are also referred to in italics below in the sections considering costs and benefits. Column 2 of Annex A provides notes to assist scheme operators to demonstrate meeting the conditions. The new set of conditions derive from making the old conditions clearer, merging some into new enlarged conditions, and adding new conditions.

Annex B shows the conditions of authorisation as they currently stand (also referred to as 'authorisation criteria'), as published on the Department's website (15 in total - although further details were included in the letters notifying schemes of their authorisation).

Total Costs and Benefits

Costs Summary – central estimate	
Type	Present Value Cost £ (Rounded)
UKAS accreditation	830,000
Membership growth	1,610,000
Accounts	120,000
Minimum technical competence	3,800,000
Continuing training	22,310,000
Surveillance	1,570,000
Sharing of names	10,000
Membership lists	80,000
Complaints procedure	40,000
Financial protection	3,700,000
Information provision	110,000
Total – PV Cost	34,180,000
Benefits Summary – central estimate	
Type	Present Value Benefit
Surveillance saving for all schemes	70,930,000
Monitoring saving	250,000
Total - PV Benefit	71,180,000
Net Impact (Benefits – Costs)	
Net Present Value: (Rounded)	£37.0 million

Estimates/Assumptions

In looking at the costs and benefits of the proposed new set of conditions of authorisation we have made a number of estimates/assumptions as to the unit costs per scheme or per member. These estimates/assumptions are based on evidence derived from a number of sources, including the responses to the consultation, discussions with scheme operators and UKAS, comparison with costs in other Departments' schemes (i.e. Green Deal, Microgeneration Certification Scheme and TrustMark) and knowledge built up within the Department over the last decade from monitoring the performance of schemes.

In costing the time of employees of scheme operators below we have used an annual salary FTE figure of £40,000, based on a typical approximate salary of a middle manager/professional in the building sector. The sources for this assumption are the ONS Annual Survey of Hours and Earnings (ASHE) and the UK figures in the Hays Construction International Salary Guide 2012. In some cases, particularly in the larger competent person schemes, it is likely that some of the tasks required by the changes to the conditions would be carried out by staff on lower salaries than £40,000 per annum FTE, but in respect of this Impact Assessment we have chosen to use that figure to make sure we fully capture the costs for all the schemes.

Conditions not changed or with no additional cost

Some of the current conditions have not been changed in substance as they deliver the required outcomes. There will therefore be no additional costs or benefits. The proposed conditions which fall into this category are:

Condition 4

Scheme operator to ensure that the scheme is financially viable and self-sufficient within a reasonable timescale.

The scope of this condition has not changed. It means that scheme operators must have sufficient resources to operate their scheme without dependence on other organisations. There should be no additional cost to scheme operators as fees structures should be set to achieve this condition.

Condition 5

Scheme operator to have an absence of, or methods for avoiding, conflicts of interest between the commercial interests of any sponsoring or parent organisations and management of the scheme.

This is in effect a current condition. Where schemes are part of, or owned by, a larger commercial, trade or professional group, the scheme should document how any conflicts of interests will be managed. No additional cost.

Condition 11

Scheme operator to provide ongoing technical and other help and advice to members (i.e. post registration), provided such help/advice does not cause any conflicts of interest with certification activities of the scheme operator.

Although not a current condition, in practice all scheme operators provide this service for their members, so there will be no additional cost in making this a condition.

Condition 13

Scheme operator to have effective sanctions in place for dealing with non-compliance with the Building Regulations and/or a breach of scheme rules by members of the scheme.

This builds on a current condition which requires scheme operators to have in place processes to deal with scheme members whose work is found not to comply with requirements of the Building Regulations, but it has been expanded to include non-compliance with scheme rules. The scheme's rules should set out the range of sanctions to be applied in circumstances particular to that scheme. No additional cost.

Condition 18

Scheme operator to require its members to remain responsible for ensuring that all scheme work carried out under a contract with the customer is compliant with the Building Regulations.

This is covered by a current condition, but the new more targeted wording will give greater clarity on responsibility for compliance in cases where some of the work is subcontracted. No additional cost.

Condition 19

Scheme operator to take measures to ensure that it is notified by members of all completed work required under the scheme and to forward to all customers a certificate of Building Regulations compliance.

This is a current condition which puts in place the process to comply with a duty in regulation 20 of the Building Regulations 2010. No additional cost.

Condition 21

Scheme operator to take measures to ensure that it is notified by members of all completed work required under the scheme and to forward this information to the relevant local authority in the format agreed with LABC.

This is also a current condition which puts in place the process to comply with a further duty in regulation 20 of the Building Regulations 2010. No additional cost.

Conditions with negligible additional cost

Scheme operator technical expertise

Condition 3

Scheme operator, including assessors and inspectors that it employs, to have the technical ability to assess/inspect the competence of prospective and existing members to deliver compliance with the requirements of the Building Regulations.

This condition is more targeted than the current similar condition as it helps to make sure that the staff of the scheme operator, whether directly employed or subcontracted, have the relevant technical expertise to carry out the assessment and inspection of members where such expertise is needed.

Costs

The Department considers that all currently authorised schemes have the degree of technical expertise required already, some directly employed as in the Ascetiva scheme, some on contract as in the FENSA scheme. We also consider that no new scheme operator would apply for authorisation unless it had arrangements in place for the required technical abilities. We therefore estimate that there would be no or negligible additional costs in complying with this condition.

Benefits

Currently applicants to operate a competent person scheme have to comment only on experience in the relevant 'field' applied for. To open up to fairer competition this more robust condition will require applicants to demonstrate that they have the technical ability to run a scheme or are able to 'buy in' the expertise.

Scheme rules publication

Condition 8

Scheme operator to establish and publish scheme rules, including its application and certification processes and fee structure.

This is in effect a current condition. The notes on meeting the condition indicate that publication should be on the scheme's website, which most schemes already do. Where they do not, this information would be held by the schemes and would just require formatting and insertion on its website.

Costs

For the reasons explained above, any additional cost would be negligible.

Benefits

This will enable a prospective member to ascertain exactly the level and types of scheme fees and how the scheme is run. This will give a prospective member more choice to see which scheme is best suited to their needs

Conditions incurring additional costs

UKAS accreditation and requirement for a robust management system

Conditions 1 and 2

Scheme operator to give a commitment to achieve/maintain UKAS accreditation to standard BS EN 45011:1998 (or latest equivalent standard) within a period agreed with DCLG and to ongoing external monitoring by UKAS. Scheme operator to meet all the relevant requirements in EN 45011 whether or not separately specified in these conditions of authorisation.

Scheme operator to have a robust and non-discriminatory management, quality and administrative system.

Note: BS EN 45011:1998 is available at: www.standardsuk.com.

Monitoring of scheme operators to assess compliance with the requirements of the Building Regulations and whether a scheme operator is operating within the existing conditions of authorisation has to date been carried out on an *ad hoc* basis by the Department through contracts with external consultants or research bodies. This has proved unsatisfactory for a number of reasons:

- each monitoring exercise was carried out as a one-off activity by different consultants and therefore lacked consistency over time
- the Department has not been able to monitor as frequently as desired resulting in some significant scheme operator deficiencies coming to light only after a long period
- monitoring was not against a standard set of conditions of authorisation or a defined and objective quality assurance standard which to some extent devalued the results of the monitoring.

The Department has therefore proposed a new condition (no 1) that it would be beneficial to require all scheme operators to achieve UKAS accreditation to British Standard EN 45011 and to commit to periodic monitoring by UKAS against that standard and the new set of conditions of authorisation, much of which overlap. The requirement for UKAS accreditation for competent person scheme operators aligns with the accreditation requirements for certification bodies in DECC's Green Deal and Microgeneration Certification Scheme. We are also proposing to introduce a more robust condition (no 2) to underpin EN 45011, which requires quality assurance for a scheme's management and administrative systems.

Costs of introducing and operating under UKAS accreditation

The following factors have been taken into account in estimating the costs of UKAS accreditation:

Fees to cover work by UKAS

The analysis of the cost of UKAS fees is carried out in three sequential scenarios:

1: If the Green Deal did not exist and DCLG policy bears all of the costs

- i. Of the 18 current competent person scheme operators, nine are already accredited to EN 45011 for other purposes and the other nine are not.
- ii. For a body which had not been previously accredited to EN 45011 for any purpose UKAS charges an application fee of £1,200 to cover its costs incurred. UKAS estimate for bodies in this category 10-12 days would be needed on average for the assessment and UKAS's current day rate for assessors is £965. This would result in costs in the range £10,850 to £12,780, with a central estimate per scheme operator of £11,815. For nine schemes this would give a one-off cost of £106,335.
- iii. For a body which had been previously accredited to the standard for another purpose there would also be an application fee of £1,200 for an extension to the accreditation but UKAS estimate in this case only 4-6 days would be needed for assessment at a cost of £965 per day. This would result in costs of in the range £5,060 to £6,990, with a central estimate of £6,025. For nine schemes this would give a one-off cost of £54,225.
- iv. UKAS also carry out ongoing periodic surveillance of accredited bodies to check that they are maintaining the accredited systems and quality. On agreement with UKAS, this may be risk-based for schemes at some stage but UKAS estimate initially an average annual cost of £3,000 per body. In respect of the 18 currently authorised competent person schemes this would represent an annual cost of £54,000 for the nine years following initial accreditation.

2: With DECC Green Deal policy bearing some of the costs with DCLG policy

- i. 17 of the 18 currently authorised schemes are seeking to become Green Deal certification bodies. The Green Deal also requires accreditation to EN 45011 and UKAS are carrying out the Green Deal assessments and the competent person scheme assessments as one assessment per body, as the requirements and arrangements are the same for most aspects of the bodies' work. DCLG and DECC therefore agree that it would be a fair assumption to attribute half of the initial accreditation costs and ongoing surveillance costs to the requirement in the competent person schemes conditions of authorisation and the other half to Green Deal requirements. This would give the following costs attributable to competent person scheme requirements as:

- for eight of the nine schemes not previously accredited - £47,260 initial accreditation costs

- for the one scheme not involved in the Green Deal - £11,815 initial accreditation cost
- for the nine schemes seeking an extension to accreditation - £27,113 initial accreditation costs
- for the 17 schemes in the Green Deal - ongoing surveillance costs per year of £25,500 for the nine years following accreditation
- for the one scheme not in Green Deal - ongoing surveillance cost per year of £3,000 for the nine years following accreditation.

ii. As mentioned elsewhere in the Impact Assessment, the Department estimates that there would be on average one new scheme operator per year which would then need to apply for UKAS accreditation. We also estimate that half of the new scheme operators would also be applying for Green Deal accreditation. Ignoring the fact that some of the applicants might have been accredited for other purposes and would in fact be applying for an extension to accreditation (this would only be known on receipt of an application to run a competent person scheme) this would give the following costs:

- one new scheme every second year not in Green Deal, £11,815 initial accreditation costs plus £3,000 per year surveillance costs
- one new scheme every second year in Green Deal, £5,908 initial accreditation costs plus £1,500 per year ongoing surveillance costs.

3: With DECC paying for some of the costs of both DCLG and DECC policy

i. In actual practice 17 of the existing schemes are not going to have to bear all of the cost of their initial UKAS accreditation fees. As part of the preparations for the Green Deal DECC has agreed to pay all of the accreditation costs of ten of the competent person scheme operators and half of another seven. This will result in a cost to DECC of amounts attributable to this policy of £57,000. This would greatly reduce the costs given above for the existing schemes. Two of the seven schemes are already accredited for other purposes and their initial costs of UKAS fees would be £3,013 each; the costs for the other five would be £5,908. DECC would not be bearing any of the costs of ongoing surveillance.

ii. This gives a total present value cost over 10 years for UKAS of carrying out the accreditation of £435,000.

Internal scheme costs preparing and maintaining accreditation

In addition there will be internal costs of preparing for and maintaining UKAS accreditation for schemes. EN 45011 is in effect a quality management system and requires a significant amount of documentation and recording of quality system policy and procedures. Well run schemes will have most of the information needed but perhaps not in quite the right format. Other scheme operators will have considerably more work to do to be able to demonstrate to UKAS their fitness to be accredited. If a scheme has been accredited to EN 45011 for other purposes it will have little additional work to do for accreditation for its competent person scheme activities.

Bearing this in mind, the Department estimates that where schemes have no current accreditation there would be additional internal costs of £20,000 to be ready for a UKAS assessment for competent person scheme purposes, based on half a person's annual salary FTE of £40,000 (source explained under *Estimates/Assumptions* above). Ten of the existing schemes are in this category giving a total one-off cost of £200,000. Where such accreditation had been achieved for other purposes the estimate is £5,000 per scheme operator. Eight of the existing schemes are in this category giving a total one-off cost of £40,000, a total of £240,000.

For new scheme operators authorised in the future the Department has assumed, as above, that half will be also in the Green Deal. We have also assumed that none would have been

previously accredited for other purposes. At an average of one new scheme operator per year this would give internal costs of £20,000 per year.

This gives a total internal scheme present value cost of £390,000, on top of the UKAS fees costs identified above which have a present value cost of £435,000, resulting in an overall present value cost (rounded) over 10 years for UKAS accreditation of **£830,000**. This includes an initial one-off transition cost to business in respect of existing schemes of £330,000 – made up of £90,000 initial costs to UKAS and £240,000 initial internal scheme costs.

Benefits of UKAS accreditation

If UKAS accreditation were not required the Department would need to undertake the monitoring of competent person schemes itself, at the Department's expense as the Building Act 1984 does not allow the Department to charge schemes. As the Department does not have staff resources to do this itself it would have to employ a contractor to carry out this task on its behalf. Based on the cost of the past two monitoring reports the Department commissioned and assuming we carried out a monitoring exercise every two years there would be a saving to the Department of approximately £50,000 every second year.

This gives a total present value benefit over 10 years for monitoring savings of **£250,000**.

We anticipate that UKAS accreditation would enhance the performance of scheme members so that a smaller proportion of schemes would require annual inspection of their members through risk-based surveillance than would otherwise be the case. This benefit is monetised below (condition 12). There are a significant number of other non-monetised benefits to UKAS accreditation of competent person schemes:

- a level playing field between schemes as all would be accredited to the same quality assurance standard
- greater assurance for the Department and Ministers that schemes were achieving their primary objective of compliance with the Building Regulations and also that the conditions of authorisation were being adhered to
- greater assurance for the customers of members of the schemes that the work they had carried out complied with the Building Regulations
- greater customer assurance would enhance the reputation of competent person schemes and make potential customers more likely to choose members of schemes for work to be carried out
- more frequent and consistent surveillance of schemes which would pick up any deficiencies earlier than under the current *ad hoc* arrangements.

Note: The accreditation costs given above are significantly less than estimated in the consultation stage Impact Assessment and as feared by some respondents to the consultation. Accreditation is currently being carried out by UKAS and a number of the Department's earlier assumptions on costs have not been borne out in practice by the costs that schemes are currently paying. For example, we have a much better indication of the number of assessment days UKAS estimates it would need for its assessments. We also overestimated the number of additional staff which schemes would need to devote to preparing for UKAS assessment. Rather than take on additional staff for this purpose, evidence indicates that schemes have generally chosen to redeploy existing staff (the consultation document is available on the Department's website - see address on page 5).

Membership growth

Condition 6

Scheme operator to promote the development and growth of the scheme to potential members and its use to customers.

This condition is in part a new requirement as it is targeted at achieving action by scheme operators to recruit more members from installers not already in a scheme and to publicise to potential customers the benefit of employing its members. The current similar condition simply required scheme operators to publicise the scheme. It will help ensure that scheme operators actively pursue the growth and use of their schemes. There will be a cost involved as the scheme will have to advertise and recruit. Successful schemes will continue to attract new members and the members more customers.

It is the Department's policy that as many competent installers as possible join competent person schemes for the authorised types of work as this will bring them more firmly into the regulated sector and help achieve higher levels of compliance with the Building Regulations. It is also our policy that the use of registered installers by consumers be encouraged so that consumers have a higher chance of getting work done that is compliant and an avenue of redress through the scheme operator should the work not meet the requirements. The Department considers that the schemes should contribute towards these policy aims.

In the responses to the consultation, most scheme operators (but not the other respondents) felt that this condition could undermine the maintenance of proper standards or lead to "poaching". The Department considers that compliance with conditions 1, 9, 10 and 12 would prevent any lowering of standards. However, the revised notes to condition 6 make clear that the target for growth is not to be by means of poaching members from other schemes but by attracting competent members who are not in any other scheme.

Many existing schemes already carry out promotional activities within their trade areas in order to attract more members as there is an incentive in terms of their income. This includes advertising through their websites, in trade journals and at trade events. All the scheme operators also contribute to the Competent Persons Register, a website designed to provide consumers with the opportunity to search for an installer registered with one of the schemes. However, few use funds to make the existence of their schemes and the benefits of using registered installers more widely known to potential customers. If they were to do so their members would be likely to have more customers which would benefit the schemes.

The condition is therefore aimed particularly at the latter wider purpose. For example, in some cases scheme operators are now jointly promoting schemes for types of work rather than as individual schemes, maximising the benefit of promotional activity (e.g. for domestic electrical installations through the Electrical Safety Council). The Department cannot require, but would certainly encourage, more collaborative effort of this nature in other type of work areas.

The Department would expect schemes to advertise their schemes, but considers that it is not best placed to decide on what further promotional activity would be best for a particular scheme or sector and that schemes should develop whatever they think would be most effective. Factors that may demonstrate whether schemes are complying with this condition include: an appropriate budget allocated to promotional activity in their accounts; a sustained increase in their membership, where feasible; and a sustained increase in the total number of jobs that their members carry out.

Costs

Schemes vary greatly in size and therefore financial resources. The Department is mindful that schemes with relatively few members will not have funds to devote large amounts to promotional activity. We have therefore based costs on what the Department considers average expenditure should be without taking account of the size of each scheme individually.

We have estimated an average transitional cost of £10,000 per scheme, based on one quarter of one person for one year at a FTE cost of £40,000, for planning and project management of

promotional effort, which would result in a total transition cost of £180,000 for all 18 current schemes.

In some areas, for example replacement glazing, cavity wall insulation or, air-tightness testing, there remain very few installers in the industry not already in schemes and it would be unreasonable to expect scheme operators to have to expend large amounts on promotional activities to attract further members. However, we consider that it would be reasonable for them to incur sufficient expenditure to make new businesses aware of the benefits of registering with their schemes and help raise public awareness.

Where there is little further opportunity to recruit additional members except from new businesses in the areas where the schemes operate (i.e. 7 schemes) we estimate that schemes would each be expected to spend £5,000 per annum on this and on publicity to customers.

For the other schemes (11) we consider that promotion and publicity costs would total £10,000 per annum, but have assumed that one scheme per year of these schemes would reach maturity and reduce spend to £5,000 per annum.

In addition any new scheme operator would need to spend a similar amount of £10,000 per annum and we estimate that there would be on average one new scheme operator each year.

This would give a total present value cost over 10 years of **£1,610,000**.

Benefits

Growing membership of the schemes and greater public awareness of the benefits of using members of schemes will lead to more compliant work being carried out by competent installers and thus more customer satisfaction, and place less burden on building control bodies as a higher percentage of lower risk building work will be self-certified. It also reduces the costs to householders of having work carried out as no building control charge is payable. It will also lead to higher income for scheme operators and their members, making them stronger and more effective, and increase the reputation of both. These benefits have not been monetised.

Accounts

Condition 7

Scheme operator to provide annual accounts, independently audited, for the scheme itself.

Currently scheme operators are required only to produce accounts. As most are part of or subsidiaries of larger organisations some of the schemes have incorporated their accounts as part of the larger organisation's consolidated accounts and it has not always been possible to ascertain the financial health of the schemes or their income and expenditure. The revised condition requires scheme operators to produce accounts specific to the scheme itself, which should be independently audited.

Costs

All scheme operators produce accounts of some nature at the moment, which they need for internal business purposes. We estimate that 50% of the schemes produce accounts currently in the form required and would incur no additional costs. For the others it would be required to extract a subset of information from the consolidated accounts of the larger organisation and present that separately for auditing. To give an indicative sense of the additional costs of the change to this condition we have estimated a first year transitional cost of £2,000 to change systems etc and an annual ongoing cost of £1,000, based on an annual salary FTE cost of £40,000 per person. We also estimate that the number of scheme operators would grow by one

per year but such new operators would not face a transitional cost, only the ongoing one. This indicative estimate gives a total present value cost over 10 years of **£120,000**.

Benefits

This will give enhanced transparency and accuracy of the operation of the schemes along with better risk management. This will also give a reassurance to the Department and Ministers, scheme members and the general public that the scheme operator is complying with conditions 4 and 5 relating to financial viability and avoidance of conflicts of interest. These benefits have not been monetised.

Minimum Technical Competence

Condition 9

Scheme operator to assess existing members and applicants as technically competent, against National Occupational Standards (NOS) under a Minimum Technical Competence (MTC) assessment procedure where one is in place for the relevant type(s) of work. For applicants this should be before registering them with the scheme. The assessment must include an on-site inspection.

This condition will set defined national minimum technical competence requirements for all existing members and prospective scheme members rather than as currently scheme-based competence requirements. There are now MTCs with their associated NOS in place or in later stages of development for almost all types of work authorised for competent person schemes. These will form the technical competence requirements against which existing members and all new applicants to schemes must be assessed in future. Where existing members have previously been assessed as competent against NOS there will be no requirement to assess them again. The method of assessment set out in the MTCs is more rigorous and will be the same for all scheme operators authorised for a particular type of work.

NOS are developed by the relevant sector skills bodies (e.g. Summit Skills or Construction Skills) at no cost to scheme operators. MTCs have been developed by the scheme operators with the help of outside bodies such as professional or trade associations with no cost except in time.

Costs

All existing competent person scheme operators except those for replacement glazing have already carried out a competency assessment for members when they joined the schemes and therefore there will be no need to reassess these existing members. Doing this in future following a standard MTC procedure to common NOS arguably should be cheaper than the various scheme based systems that have grown up. Some scheme operators are already using the new MTC/NOS documents for this purpose. For these schemes we do not think that this revised condition would entail any additional expenditure on the scheme operators or applicants to the schemes.

At present there is no pre-registration competence assessment for those wishing to register with the existing five schemes authorised for replacement glazing. The new condition means that these scheme operators will need to assess all existing members against the relevant MTC/NOS documents. As at 30 September 2011 there were a total of 11,324 members for the five schemes, according to the last membership statistics collected by the Department. We estimate the cost of assessment would be on average £225 (low £150, high £300), based on costs arising in other schemes. As there are such a large number of firms to be assessed we consider that this would be done over a two year period, half in the first year and the other half in the second. This would give a one-off total transition cost of £2.50m, discounted over two years.

It is now estimated that there is a 95% penetration of replacement glazing firms already in competent person schemes so the number of potential new members is relatively small and consists mainly of new firms being founded. Based on statistics collected on membership of schemes we estimate that there would be about 500 new glazing firms per annum whose competence would need to be assessed on joining a scheme and that each competence assessment would cost £300. This is a higher figure than for existing scheme members where scheme operators will already hold compliance records on these firms. This would give a present value cost over 10 years of £1.29m.

The total present value cost over 10 years of introducing minimum technical competences is therefore **£3,800,000**.

New scheme operators are already required to assess the competence of applicants for registration based on scheme-designed competency requirements. These requirements will now be based on MTC/NOS requirements but we do not think that there will be any additional costs to future scheme operators because of the change to this condition.

Benefits

This condition will bring consistency and reliability in the way that competence is measured throughout each industry and in the long term save money after the initial cost. It will ensure that installers are competent and deliver more compliant work leading to increased customer satisfaction in the short term. In the longer term the customer should face fewer problems when it comes to selling their property. A rigorous initial assessment of competence means that there is less risk in moving to a risk-based surveillance regime.

This change, together with a number of other new conditions outlined in this assessment, including the requirement for continuing training (condition 10) and a more robust complaints procedure (condition 16), is intended to increase compliance leading to fewer inspections. The impacts of these changes are monetised under condition 12 on surveillance, to avoid double counting (see also 'Benefits – general' on pages 26-27).

Continuing training

Condition 10

Scheme operator to ensure that its members' competences are kept up to date, for example, as a result of changes to the Building Regulations and/or BS/EN standards or technical approvals.

The purpose of this new condition is to help ensure that members of the schemes remain fully up to date with requirements and standards and the ways in which they can be achieved. Keeping up to date could, for example, take the form of formal training courses provided in-house or at a technical college, seminars or distance learning packages which should be available to all members.

The Department has now instituted a periodic review timetable for the different parts of the Building Regulations which in general means that each part is likely to be reviewed and amended as appropriate periodically; for the purpose of this analysis we have assumed once every six years which was the original intention. This would mean that members of schemes would normally need to undergo mandatory training for each type of work at least once every six years. However, it is possible that changes to European or British Standards might increase this. As many scheme members are authorised for more than one type of work they would in some cases need to undergo mandatory training more often than once every six years.

Costs

All those currently authorised for gas appliance installation work (about 50,000 installation firms) and for electrical installation work in dwellings (about 52,000 firms) already undergo competence update training for other purposes and thus there would be no additional cost to them. This would leave up to 50,000 firms (including members of other existing schemes and potential new schemes over the next ten years) which would incur additional costs in keeping their competences up to date. We have assumed an estimated cost of £250 every six years. This cost is estimated on the basis of an average cost of one day external training courses, in-house seminars or courses and the costs of using a distance learning package. This gives an indicative estimate present value cost over 10 years of £17,930,000.

Much of the continuing training will take place outside normal working hours (i.e. at weekends or in the evening). For example, FENSA has in the past scheduled seminars only in weekday evenings. There would thus be no loss of earnings for those participating in such training.

However, some will take place during working hours. It is not possible to give an evidence-based estimate of the numbers who might suffer a loss of earnings because they were unable to work round the times they would need to undergo continued training as this will depend on the future choices of the method of continued training adopted by scheme operators. If half of those needing continuing training (i.e. 25,000 firms) lost on average £112 earnings (based on an average wage in the building trades of £14 per hour) there would be an overall cost of £2,800,000 every six years, giving an indicative present value cost of £4,020,000.

There will be a one-off cost of setting up the additional training activity, such as liaising with technical colleges and other training providers, which we estimate at £20,000 per scheme, based on 50% of the annual salary FTE of one person for one year of £40,000. This gives a one-off total transitional cost of £360,000.

This gives a total present value cost over 10 years for continuing training of **£22,310,000**, which represents an annual equivalent cost of £2.59m.

Benefits

Ensuring that scheme members are kept up to date with regulatory and standards changes will ensure competence and deliver more compliant work leading to increased customer satisfaction and potentially the need for fewer risk-based inspections. See also condition 9 (Minimum Technical Competence) benefits and 'Benefits – general' on pages 26-27.

Surveillance

Condition 12

Scheme operator to undertake surveillance of its members' work, including carrying out periodic random inspections of a representative sample of each member's work, during or after completion, to check compliance with the Building Regulations.

To help ensure that members of schemes comply with the relevant requirements of the Building Regulations scheme operators are currently required by a condition to carry out surveillance of members' work through random inspections. The work to be inspected is chosen by the scheme operator, not the member, and must encompass a representative sample of the members' work.

At present the surveillance requirement for most schemes is that there should be at least one random annual inspection per year. There are two significant variations to this:

- for 11 schemes (all except those listed in the following bullet points), at least one annual random annual inspection
- for HETAS and OFTEC (which have had no inspection requirement placed on them), respectively three years and five years.

- all replacement glazing schemes (FENSA, CERTASS, Network Veka, BM Trada and BSI) 1% of members' work with at least two random inspections of members per year and a maximum of 100 per year.

Costs and Benefits

The current numbers and cost of these inspections are shown as the baseline costs in the following table:

Current scheme	Average cost per inspection	No of inspections annually	Annual cost
HETAS - 3 yearly inspection -	£310	655	£203,000
OFTEC - 5 yearly inspection	£310	1,993	£618,000
10 schemes - annual inspection	£310	43,131	£13,371,000
5 replacement glazing schemes - see note ii below	£125	22,648	£2,831,000
BINDT (Air tightness testing scheme) – annual inspection	£570	306	£174,000
Total: 18 schemes	n/a	68,733	£17,197,000

Notes to table:

i. The number of inspections is based on reported membership figures at 30.9.11.

ii. The cost per inspection is based on information provided by the schemes themselves.

iii. The number of inspections for replacement glazing schemes is based on two per member per annum. A few installers will be sufficiently large to have more inspections per year but as the Department does not know how many there would be in respect of these large installers no allowance has been made for them.

We are proposing that inspections of scheme members' work will in future be carried out on a risk-basis. This means that those scheme members which had established a good track record of compliance would be inspected (and have to pay for inspections) less often. For example, most scheme operators are required now to carry out one random inspection of members annually. Where an inspection identifies faults there is currently no sanction beyond the member being required to put the faults right; i.e. there is no increase in the number of inspections. Under a risk-based system members could benefit by moving to one inspection every three years. To control the risk, this privilege would be granted only to those members who had established a track record of full compliance over the preceding two or three years and the privilege would be lost if an inspection (either random or following a complaint) found a significant non-compliance with the Building Regulations. The loss of the privilege would mean members paying for more inspections than if they had not lost the privilege.

This should lead to more consistency within the industry sectors. The financial benefit of this will be gained by members of those schemes currently inspecting more frequently than will be

required under the new policy. There will also be a greater incentive for members to comply as if they do not to do so they will incur a financial penalty of having to pay for more inspections.

All installers currently registered with competent person schemes would move to a risk-based system of surveillance with a maximum of three years between inspections. Previous monitoring reports carried out by the Department and other information received periodically from schemes has shown that surveillance inspections identify that about 5% of installers are found not to have complied with the Building Regulations. These would therefore not move to a risk-based surveillance regime but would continue (or move to) on an annual basis until they had re-established a good record of compliance. We estimate on average that there would be also a 5% churn of members, with some firms ceasing to trade but replaced by new members. These new members would only move to a risk-based system after two full years in the scheme.

This would have the following effects on costs for schemes, with at any one time an estimated 90% of members on a three year cycle and 10% on an annual cycle:

HETAS: This scheme is already on a three yearly inspection cycle so the only change would be that those who failed an inspection would be inspected more often. Based on the scheme membership at 30 September 2011, in any one year there would be 590 inspections for those who were on a three yearly cycle and 197 for those who had lost the right to three yearly inspections and had reverted to an annual inspection or were new members; a total of 787 inspections per year.

OFTEC: This scheme is currently on a five yearly inspection cycle and would be asked to move to a three year risk-based inspection cycle. Based on membership as at 30 September 2011, in any one year there would be 2,989 inspections for those on a three yearly cycle and 997 for those who had lost the right to three yearly inspections and reverted to an annual inspection or were new members; a total of 3,986 inspections per year.

Schemes currently on annual inspection (excluding BINDT): The 10 current schemes would be allowed to move to a three year risk-based inspection basis. Based on membership as at 30 September 2011, in any one year there would be 12,939 inspections for those on a three yearly cycle and 4,313 for those who had lost the right to three yearly inspections or were new members; a total of 17,252 inspections per year.

Replacement glazing schemes: The five current schemes would be allowed to move to the same arrangements as for the schemes currently on annual inspection. Based on membership as at 30 September 2011, in any one year there would be 3,397 inspections for those on a three yearly cycle and 1,132 for those who had lost the right to three yearly inspections or were new members; a total of 4,529 inspections per year.

BINDT: BINDT would be allowed to move to the same three yearly arrangements as for other schemes currently on annual inspections. Based on membership as at 30 September 2011, in any one year, there would be 92 inspections for those on a three yearly cycle and 31 for those who had lost the right to three yearly inspections or were new members; a total of 123 inspections per year.

As most scheme members will be inspected less often than previously it seems likely that inspections would in many cases look at a broader selection of work and take a bit longer. We have therefore added 20% to the average cost per inspection to take account of this.

This is summarised in the following table:

	Risk-based surveillance			
Current scheme	Average cost per inspection	No of inspections annually	Annual cost	Saving over baseline
HETAS	£372	787	£293,000	- £90,000
OFTEC	£372	3,986	£1,483,000	- £865,000
10 schemes annually	£372	17,252	£6,418,000	£ 6,953,000
5 replacement glazing schemes	£150	4,529	£679,000	£2,152,000
BINDT	£684	123	£84,000	£90,300
Total	n/a	n/a	£8,957,000	£8,240,000

For all the schemes together, this £8,240,000 saving gives a total present value benefit over 10 years of **£70,930,000**. This estimates the benefit, through fewer, more effective risk-based inspections which will be realised as a result of both this change to the risk-based regime and other changes outlined which will reduce the number of inspections through improving the general functioning of the system.

To reflect the uncertainty in the assumed proportion of members who will require annual rather than three yearly inspections, we have carried out sensitivity testing which is reported under the sensitivity analysis (pages 27-28).

There will also be a one-off transition cost for scheme operators of setting up an electronic surveillance timetabling system, estimated at £4,000 per scheme (based on one-tenth of an annual salary FTE of £40,000 per person) or a present value cost of £72,000 in total for all schemes.

The changes to the surveillance regime will involve little additional effort for members as the inspection process will be largely unchanged. However, some familiarisation time may be needed for some to understand the new risk-based regime. We have therefore estimated half an hour per business at a rate of £30 per hour for approximately 100,000 businesses, based on average hourly costs for the managers/owners of member businesses, which gives a one-off cost to member businesses of £1.5m and a total transitional cost of **£1.57m**.

The above analysis does not take into account two factors:

- i. Overall the Department considers that there will be a net increase of members over time, i.e. there may be more new members of the current schemes than allowed for under the estimated churn of members. However, the Department cannot foresee which schemes might have a net increase or estimate the number of members in any such net increase.
- ii. The Department has estimated that there is likely on average to be one new scheme operator authorised each year. It is not possible to know how many members any new scheme operators might have and therefore how many inspections might be needed.

Overall the Department considers that risk-based surveillance will be more efficient than the previous system as surveillance will be targeted specifically at the areas of greatest risk of non-compliance. Due to the proposed safeguards, we do not anticipate any loss of compliance following this approach; it may be that there will be a small improvement due to targeting and mitigating areas of greatest risk.

Sharing of names

Condition 14

Scheme operator to use an agreed mechanism to make available to other competent person schemes and other interested parties the names of former members whose membership has been terminated by the scheme and the reason for termination.

This is a new condition to prevent 'rogue' members whose membership is terminated by one scheme simply transferring to another scheme without the receiving scheme's knowledge, and to make sure that the receiving scheme is aware that the applicant has been dismissed from the previous scheme. This will be accomplished by adding the names of terminated members to a password protected website available only to scheme operators.

The notes to condition 14 make it clear that all registered members must be informed that their names will be added to the website if their membership is terminated by a scheme operator. The information will be given to the applicants for membership who would have the opportunity not to proceed with their application if they objected to this condition. Existing members will be told of this condition at the time of annual membership renewal with the opportunity not to renew their membership if they object to the condition. No names would be given to the website until the members had the opportunity not to join or to leave the scheme if they objected to this condition.

Costs

There will be a cost of setting up the password protected site which will probably be operated as an adjunct to the existing LABC site used for other competent person scheme notifications. Based on discussions with LABC, we estimate a one-off present value cost of doing this of **£5,000** covering all schemes.

The cost of adding names to the site should be negligible given the very small number of members which have their registration terminated.

Benefits

This condition will help remove 'rogue' installers from the competent person scheme system and encourage greater compliance with the Building Regulations and with scheme rules. See also condition 9 (Minimum Technical Competence) benefits and 'Benefits – general' on pages 26-27.

Membership lists

Condition 15

Scheme operator to keep and publish membership lists and the type(s) of work for which members have been assessed as competent.

Scheme operators are currently required to hold this information and make it available in some form, at least as far as membership lists are concerned, on their own websites. Inclusion of the type of work for which members have been assessed as competent is new.

Costs

Scheme operators already hold this information and we estimate that there might be on average a one-off administrative cost of £3,000 per scheme operator, based on an annual salary FTE cost of £40,000 per person, to add the type of work information to their websites. This would give an initial one-off cost for the 18 existing schemes of £54,000 plus £3,000 per year for assumed new scheme operators, resulting in a total present value cost over 10 years of **£80,000**.

Benefits

This will allow customers to check if a named firm is in fact a member of a scheme for a particular type of work or to find a competent installer for that type of work. This benefit has not been monetised.

Complaints procedure

Condition 16

Scheme operator to have a robust and publicised complaints procedure.

Scheme operators' complaints procedures must at a minimum cover complaints from customers of non-compliance with the Building Regulations by scheme members, but many will also entertain other types of complaints relating to the scheme. As this is a current condition, all scheme operators currently operate formal complaints procedures which in almost all cases successfully deal with justified complaints from customers. However, as indicated in the notes accompanying this condition, the Department will in future require each scheme operator to set out on its website the stages of its complaints procedure so that those wishing to use it are aware of how to do so and what to expect at each stage.

We are also asking schemes to make sure that their complaints systems are consistent with the principles of complaints management in the Office of Fair Trading Consumer Codes Approval Scheme. This will have the benefit of a clearer route for the customer to follow and a more uniform approach across the schemes.

Costs

We have estimated a one-off administrative cost of £2,000 to the scheme operator in respect of placing complaints procedures information on their websites and checking that the procedures are consistent with the OFT Code. This would give a one-off present value cost of **£36,000** for existing scheme operators.

Benefits

The new requirement to publicise the scheme's complaints procedure will allow customers wishing to make a complaint to ascertain what types of complaints can be dealt with by scheme operators and a better idea of how to follow the necessary procedures. If customers submit better formulated complaints there may be some savings in effort by scheme operators in having to clarify the nature of complaints before being able to act on them, but this benefit has not been monetised.

If a complaint is found to be justified in terms of non-compliance with the Building Regulations, an installer would lose the right to a risk-based inspection regime and would return to an annual inspection until the installer had re-established a record of compliance, which would incentivise installers to increase compliance over time. See also condition 9 (Minimum Technical Competence) benefits and 'Benefits - general' on pages 26-27.

Financial protection

Condition 17

Scheme operator to arrange to provide customers with appropriate financial protection to put work to dwellings right, which is non-compliant with the Building Regulations, where the original installer cannot do so.

There will be circumstances where the work carried out by installers is found not to be compliant with the requirements of the Building Regulations. In such circumstances the scheme operator will direct the installer to return to the customer and carry out such remedial work, at no

additional cost to the customer, as is necessary to bring the work up to Building Regulations standards.

However, there may be circumstances where the original installer cannot return to put matters right, particularly where the firm has gone out of business through death, retirement or insolvency. It is in these cases where the customer will need a source of finance to enable the work to be put right by a different firm. Such protection has been provided to date mainly through insurance-backed warranties (paid for by customers - all schemes except BINDT) or by professional indemnity insurance (paid for by the scheme member - only BINDT).

Currently it is a condition that such protection (except for BINDT) should be offered as a possibility to customers leaving it to them to decide whether to purchase the protection. In future the new condition will require scheme operators to arrange for such protection to be provided to all customers, whether they wish to have it or not, at the customer's expense. This will bring competent person schemes into line with the financial protection arrangements under the Green Deal and the Microgeneration Certification Scheme.

Two of the current scheme operators decided voluntarily some years ago that they would provide protection to all customers. The result was very low premiums for insurance-backed warranties based on the volume of business that would accrue to the insurers. Making financial protection compulsory and in line with Green Deal and Microgeneration Certification Scheme arrangements should also result in much lower premiums than would otherwise be the case.

Costs

Most of the current scheme operators already have made arrangements with insurance providers to provide insurance-backed warranties so any extra costs should be limited to notifying additional customers' details for the policies to be issued direct to the customer. The Department considers that such notifications would be carried out electronically so the cost would be limited to setting up an electronic system to do so. The cost of the insurance would be debited from the bank accounts of the scheme members at the same time as the cost of the notification fee for the work is debited, the members having already added the cost of the financial protection to the customers' bill for the work done, i.e. the cost will fall to the consumer not to scheme operators or their members.

We estimate that the additional cost of setting up the electronic system would be a one-off transitional cost of £10,000 per scheme operator (based on an annual salary FTE of £40,000 per person) or £180,000 in respect of all existing scheme operators. If it assumed that there would be one additional scheme operator added per year there would then also be a cost of £10,000 per year for each of the following ten years.

In addition to the one-off costs to scheme operators of establishing a system to provide financial protection, there will be a small administrative cost in providing consumers with copies of standardised documentation setting out the terms of the protection. We estimate that this would be an added cost of £0.20 per job administrative cost where protection was given. There are about two million jobs per year where the protection would be given where it is not currently given, making an annual cost of £400,000. The insurance documentation would be sent to the customer along with the already provided building regulations compliance certificates at no extra postal costs. This will have the effect of spreading the risk amongst consumers so that the costs of fixing a problem will be borne by all consumers and not just those who have incurred the problem.

This gives a total present value cost over 10 years for financial protection of **£3,700,000**.

Benefits

The unmonetised benefit is universal protection for consumers who have had work done by members of competent person schemes.

Information provision

Condition 20

Scheme operator to provide the information DCLG requires in order to carry out its oversight functions, both on a regular basis or ad hoc as required.

This is in effect a current condition but the Department intends to require more specific information than in the past. The Department already requires schemes to provide a six-monthly statistical report on membership numbers and number of work notifications and also *ad hoc* information needed for queries and complaints made to the Department, so there would be no additional costs in respect of these types of information. As indicated in the notes to the condition, in future the Department also intends to ask scheme operators to provide:

- a six-monthly report on the number of formal consumer complaints received and their outcome
- financial information from the scheme's annual audited accounts
- information from UKAS reports on scheme accreditation.

Costs

The provision of information from the scheme operators' annual accounts and from UKAS reports will add only minimal costs as it will be a case of selection of the relevant information and forwarding it to the Department. We have therefore estimated a cost of £50 per annum for each of the 18 scheme operators.

There will be a higher cost in preparing six-monthly reports of formal consumer complaints. The Department intends to give scheme operators a template on which to make such reports. Most of the scheme operators as part of their quality management systems already keep information on complaints made to them by customers of their members. We estimate that the cost of transferring this information to the Department's template would on average cost a scheme operator £500 per annum for each of the existing scheme operators.

This gives a total present value cost over 10 years for information provision of **£110,000**.

Benefits

The information requested will help reassure the Department and its Ministers that the schemes are achieving compliance with the requirements of the Building Regulations and their conditions of authorisation, in particular accounting requirements and the requirement for a robust system to deal with complaints. This benefit has not been monetised.

Benefits - general

In considering the synergies between the benefits of the policy it is important to avoid double counting. We have therefore focused above on monetising the benefits which arise through less surveillance as a result of a risk-based inspections regime. This will result in a more efficient and cost effective system, but could potentially reduce the impact of the other non-monetised benefits. For instance it could be that an improved surveillance regime with fewer inspections reduces costs, but the impact on improved compliance is marginal with many schemes achieving the same level of compliance but more efficiently.

Given these synergy issues, we highlight below four main non-monetised benefits:

(1) Many installers wishing to join a competent person scheme will need to update their competences in order to achieve the required competence standards for membership (condition 9). In addition, the proposed new requirement for continuing training for existing members of schemes will help ensure that those members keep their competences up to date (condition 10). In those types of work where schemes are authorised this will result in a better trained and qualified workforce to the overall benefit of the construction sector and consumer satisfaction. This aligns with requirements for the Green Deal and helps support the Government's skills agenda.

(2) The proposals for more robust assessments of the competence of installers applying to join a competent person scheme (condition 9) and more robust random inspections of their completed work (condition 12) will mean that more work done by scheme members should fully meet the relevant requirements in the Building Regulations. A more robust complaints procedure (condition 16) will also incentivise installers to increase compliance over time. This in turn will lead to greater customer satisfaction with the work that they have carried out by scheme members. This will also help support the Green Deal.

(3) The proposals will ensure an enhanced level of transparency in several areas, e.g.:

- scheme operators will know that the conditions apply equally and fairly to all schemes
- more transparency on scheme funds to make sure that the funds are used to benefit the scheme and its members (conditions 4 & 7)
- more available information about schemes so prospective members will be better able to choose the scheme which best suits their needs and customers can make a better, more informed selection of someone to carry out their building work (condition 6).

(4) More robust competent person schemes should result in higher levels of compliance with the Building Regulations and provide assurance that self-certification is an effective way of achieving compliance. This benefits the building control system as a whole by allowing building control bodies to focus on higher risk areas of work.

Costs covered by Government

The only significant costs to be borne by the Government are those associated with Green Deal accreditation where DECC has agreed to pay all the accreditation fees to UKAS for ten of the current competent person scheme operators and half of such costs for another seven. These are explained more fully in the analysis of the costs and benefits of condition 1 above and are an estimated £57,000 in total, attributable to this policy.

Transitional costs to business

There will be some transitional costs incurred both for the scheme operators and for members, in adapting to the new conditions of authorisation, with a total present value cost of **£5.2m** (High: £7.2m, Low: £3.3m), which has been included in the total present value costs over 10 years. This is made up from Minimum Technical Competence (£2.5m), surveillance (£1.6m), continuing training (£0.4m), UKAS accreditation (£0.3m), membership growth (£0.2m), and financial protection (£0.3m) (with the rest accounting for under £0.1m). Details are outlined in the relevant sections above.

Sensitivity Analysis and Ranges

In order to reflect uncertainty in relation to the above assumptions and estimates, the impact of ranges on the costs and benefits in the summary sheet have been analysed and some sensitivity testing carried out.

Ranges have been assessed as follows:

- For **UKAS Accreditation**, we have assumed that the initial work by UKAS for schemes with no initial accreditation will be 11 days central estimate (High estimate: 12 days, Low estimate: 10 days) and for schemes with some initial accreditation will be 5 days (High: 6 days, Low: 4 days). Internal accreditation costs to the schemes themselves will be £5,000 (High: £5,500, Low: £4,500) if there is previous accreditation or £20,000 (High: £22,000, Low: £18,000) if there is no previous accreditation. Benefit due to less other monitoring estimated at £60,000 (High: £70,000, Low: £50,000) every two years giving a present value benefit of £250,000 (High: £300,000, Low: £210,000).
- For valuing the benefits of the **surveillance regime** it is estimated that under the new regime 10% of scheme members will require an annual inspection and inspections will cost 20% more (High: 5% of members inspected annually with inspections costing 15% more, Low: 15% of members inspected annually with inspections costing 25% more). Transition costs assume an average equivalent of 30 minutes per member familiarisation effort (High: 45 minutes, Low: 15 minutes).
- **Continuing training** costs incurred will be £250 per firm every six years (High: £300, Low: £200) with a loss of time of £112 (High: £128, Low: £96). Transition costs assumed an average of one half of a full time equivalent employee per scheme for one year (High: three-quarters, Low: one-quarter).
- Estimates for expenditure on **membership growth** are £10,000 per annum (High: £15,000, Low: £5,000) for schemes actively encouraging growth and £5,000 (High: £7,500, Low: £2,500) for more mature schemes only focusing on new business. Transition costs assumed an average of one quarter of a full time equivalent employee per scheme for one year (High: one-third, Low: one-fifth).
- **Financial protection** will typically cost a scheme £10,000 per annum (High: £15,000, Low: £5,000). Small ongoing costs for administering the scheme are estimated to affect 2 million jobs per annum (High: 2.5m, Low: 1.5m).
- The cost per scheme member of meeting the **minimum technical competence** requirements is estimated at £300 per annum (High: £400, Low: £200) with an additional transitional cost for the five replacement glazing schemes of £225 (High: £300, Low: £150). This results in present value costs of £3.8m (High: £5.1m, Low: £2.5m).

These ranges to reflect uncertainty give total present value costs of **£29.6m - £42.3m** (central: £34.2m) and total present value benefits of **£61.2m-£80.6m** (central: £71.2m). Low benefits and high costs give a net present value of **£18.9m**. High benefits and low costs give a net present value of **£51.0m**. This provides an upper and lower estimate around the central net present value of **£37.0m**.

Sensitivity Analysis using the 'Low' estimate for the surveillance regime outlined above (15% of members inspected annually with inspections costing 25% more) reduces the present value benefits and hence net present value by **£9.9m**. **The central net present value remains positive but falls to £27.1m.**

Sensitivity Analysis using the 'High' training costs per firm above (£300 every six years and loss of time valued at £128 every six years) increases present value costs by **£4.3m** and so reduces net present value by the same amount to **£32.7m**.

Impact on business for one in one out purposes

Most of the costs and benefits above fall on business as indicated below, except that DECC will contribute towards some UKAS accreditation costs and some of the benefits from less

monitoring will be to government. Ongoing financial protection costs will be to clients/consumers, not businesses (as will the benefits - see pages 24-26).

Costs and Benefits to Business

OIOO Costs Summary – central estimate	
Type	Present Value Cost £ (2011 prices - Rounded)
UKAS accreditation	770,000
Membership growth	1,610,000
Accounts	120,000
Minimum Technical Competence	3,800,000
Continuing training	22,310,000
Surveillance	1,570,000
Sharing of names	10,000
Membership lists	80,000
Complaints procedure	40,000
Financial protection	260,000
Information provision	110,000
Total – PV Cost	30,680,000
Benefits Summary – central estimate	
Type	Present Value Benefit
Surveillance saving for all schemes	70,930,000
Total - PV Benefit	70,930,000
Net Impact (Benefits – Costs)	
Net Present Value: (Rounded)	£40.3 million
Annual Equivalent net Benefit to Business:	£4.7million

The result is that the present value cost to business is £30.7m, the present value benefit is £70.9m, giving a **net present value of £40.3m (rounded)**. This translates to an **annual equivalent net cost to business of minus £4.7m in 2011 prices (-£4.4m in 2009 prices)**.

Wider impacts

Economic

The main groups affected by the new conditions of authorisation are competent person scheme operators and members, and consumers.

Small and micro-businesses

It is possible that a small number of competent person scheme operators would fall into the category of small businesses and thus be subject to the proposals. However, the decision to operate a scheme is a voluntary one so none of the existing or future operators need comply with the new conditions if they did not wish to do so. In any event, as the benefits of the new conditions exceed the costs, it is thought that most scheme operators would choose to operate under them.

Most of the members of competent person schemes will be small or micro-businesses. Membership of a scheme is voluntary and businesses if they wish can choose not to be scheme

members (i.e. they can use a building control body to check their work instead). Nevertheless the changes, in particular to the surveillance of members, should reduce costs for most members of schemes. The requirements on compulsory continued training will increase member costs a little but these will be more than compensated for by the savings for reduced risk-based inspections.

Competition

The proposals should not affect the competitive position of the scheme operators as they apply to all equally. The proposed conditions of authorisation will help create a more level playing field between schemes and encourage competition on quality rather than price.

As the proposals should mean that members of schemes are assessed to a high level of competence as set out in MTCs and associated NOS it is likely that the work of the members will more often meet the requirements of the Building Regulations. This should increase customer satisfaction and enhance the reputation of the schemes. This in turn would make it more likely that customers would choose to employ a member of a scheme than someone who was not, giving a competitive advantage to scheme members.

Social

An Equality Impact Assessment Initial Screening has been carried out and no impacts on any of the affected groups have been identified.

Environmental

One of the main reasons for bringing forward the proposals is to achieve a higher level of compliance with the Building Regulations, including compliance with the energy and water efficiency provisions in the Regulations. The proposals will therefore help achieve higher environmental standards in work carried out by members of schemes.

Other specific impact tests

These are not relevant to this Impact Assessment.

Implementation plan

The Department proposes to proceed with option 2 above and introduce the new set of conditions of authorisation for competent person schemes operating in England as soon as possible in 2012. The new conditions will be published on the Department's website (replacing the current set) and all existing scheme operators will be asked to confirm in writing that they will aim to fully comply with them as part of their authorisation, following an agreed period of transition (likely to be a maximum of two years from the date of publication). Applicants to become scheme operators in future will also be required to comply with the new conditions.

BUILDING REGULATIONS: COMPETENT PERSON SELF-CERTIFICATION SCHEMES¹ - CONDITIONS OF AUTHORISATION FROM XXXX 2012²

	Conditions of Authorisation	Notes on how to demonstrate meeting the conditions
		<i>N.B. In all cases the demonstration shall be sufficient to meet the relevant requirements in BS EN 45011.</i>
No.	Section 1 The scheme operator³	
1.	Scheme operator to give a commitment to achieve/maintain UKAS (United Kingdom Accreditation Service) accreditation to standard BS EN 45011: 1998 (or latest equivalent standard) within a period agreed with DCLG and to ongoing external monitoring by UKAS. Scheme operator to meet all the relevant requirements in EN 45011 whether or not separately specified in these conditions of authorisation.	The scheme operator shall familiarise itself and demonstrably comply with the requirements of EN 45011. UKAS accreditation should normally be achieved within two years from the date of authorisation of a new scheme or an extension of a scheme (but see also footnote 2 below).
2.	Scheme operator to have a robust and non-discriminatory management, quality and administrative system.	The scheme operator's management, quality and administrative system (including surveillance) shall be documented so as to meet the requirements of EN 45011.
3.	Scheme operator, including assessors and inspectors that it employs, to have the technical ability to assess/inspect the competence of prospective and existing members ⁴ to deliver	The scheme operator shall document how the relevant technical requirements of the Building Regulations are to be met, in relation to the types of building work undertaken. This includes where a scheme operator acquires the competence from, or sub-delegates the assessment/inspection process to, a third party.

¹ Schemes are authorised under paragraph 4A of Schedule 1 to the Building Act 1984 and are named in Schedule 3 to the Building Regulations 2010 (as amended).

² DCLG will allow existing scheme operators a two year period of grace from the date of publication of these conditions of authorisation within which to become fully compliant with them. During these two years DCLG will accept a demonstration of commitment and capability to meet the conditions, where full compliance cannot be achieved, as being sufficient for continued authorisation but a scheme will have to fully comply with all the conditions, including the achievement of UKAS accreditation, in respect of all the types of work for which it is authorised by the end of the two years if its authorisation is to continue beyond that date.

³ Referred to as a "certification body" in EN 45011.

⁴ Registered businesses, including sole traders.

	compliance with the requirements of the Building Regulations.	Assessors and inspectors must be competent at least to the equivalent level in the relevant sector Minimum Technical Competence (MTC) assessment procedure, where one is in place or is being worked towards (see condition no 9).
4.	Scheme operator to ensure that the scheme is financially viable and self-sufficient within a reasonable timescale.	<p>The scheme operator shall:</p> <p>(a) have a transparent fee structure showing income from members and how the scheme will be self-financing with a sufficient surplus for development;</p> <p>(b) ensure that the scheme is self-financing, within a period of not later than five years after authorisation;</p> <p>(c) use scheme funds received from members from registration and notification fees etc only for the benefit of members of the scheme. This can include use of funds for the general benefit of the sector in which the scheme operates.</p>
5.	Scheme operator to have an absence of, or methods for avoiding, conflicts of interest between the commercial interests of any sponsoring or parent organisations and management of the scheme.	<p>The scheme operator shall document how any conflicts of interest will be managed as required by EN 45011.</p> <p>For example: possible conflicts of interest may arise where a scheme is part of or owned by a larger commercial, trade or professional body.</p>
6.	Scheme operator to promote the development and growth of the scheme to potential members and its use to customers.	<p>The scheme operator shall advertise the scheme, explaining its purpose and benefits, to encourage potential members to join and use by customers. This includes distributing promotional literature provided by DCLG.</p> <p>The scheme operator shall document how the scheme proposes to develop and grow and from where new members covering the relevant types of work would be derived for at least the first five years following authorisation. This requirement will be met if it can be demonstrated that further membership growth is not practicable.</p> <p>The target for membership growth shall comprise competent businesses not already in a competent person scheme for the same type of work.</p>
7.	Scheme operator to provide annual accounts, independently audited, for the scheme itself.	<p>This condition will support conditions 4 and 5 as the accounts will help show that a scheme is financially viable and self-sufficient. It will also help demonstrate that there is not a financial conflict of interest.</p> <p>To be 'independently audited', accounts must have been checked by someone who is competent to check them and independent of the preparation of the accounts.</p>

		Where a scheme is authorised for more than one type of work the audited accounts may cover all the types of work for which the scheme is authorised.
	Section 2 The scheme operator and its members	
8.	Scheme operator to establish and publish scheme rules, including its application and certification processes and fee structure.	The scheme rules shall be published on the scheme's public website as a minimum.
9.	Scheme operator to assess existing members and applicants as technically competent, against National Occupational Standards (NOS) under a Minimum Technical Competence (MTC) assessment procedure where one is in place for the relevant type(s) of work. For applicants this should be before registering them with the scheme. The assessment must include an on-site inspection.	<p>Where a sector MTC is in place, it must be used. Where one is not in place a scheme operator shall determine and use an appropriate alternative means of assessing technical competence and work towards the development of an MTC with associated NOS as soon as possible, in conjunction with the relevant sector skills body (e.g. Summit Skills or Construction Skills). DCLG will provide a link to an up to date list(s) of sector MTCs on its website.</p> <p>The scheme rules shall set out details of how the technical competence of members/applicants (including those moving from one scheme to another) will be assessed. The assessment on-site shall cover all the types of work for which they are applying.</p> <p>Where scheme operators can demonstrate that existing members have been assessed as competent under the scheme's previous assessment process, there will in most cases be no need for a further assessment of competence before certification.</p> <p>Where there are gaps between the previous and current competence assessment process, any such gaps may be addressed at the next planned surveillance visit (see condition 12).</p> <p>Where scheme operators have not previously assessed the competence of existing members they will need to do so. If they are unable to assess and certify these members within the two year period of grace (see footnote 2), it may be possible for that scheme/sector to agree an appropriate further period with DCLG (in consultation with UKAS).</p>
10.	Scheme operator to ensure that its members' competencies are kept up to date, for example as a result of changes to the Building Regulations and/or BS/EN standards	This may be by means of formal generic training courses, seminars, distance learning, etc, as appropriate, which shall be equally available to all members.

	or technical approvals.	
11.	Scheme operator to provide ongoing technical and other help and advice to members as required (i.e. post registration), provided such help/ advice does not cause any conflicts of interest with certification activities of the scheme operator.	This may be accomplished by setting up telephone and e-mail helplines available to all members.
12.	Scheme operator to undertake surveillance of its members' work, including carrying out periodic random inspections of a representative sample of each member's work, during or after completion, to check compliance with the Building Regulations.	<p>A scheme operator shall, under a risk-based approach, undertake a minimum of one on-site inspection of each member's work every three years. This period shall be granted to existing members who have a clean track record, as defined and documented by the scheme operator. This will need to be based on factors such as inspection outcomes, significant complaints and major changes in personnel. Those members without such a record shall be inspected on an annual basis until they have such a record. New members will need to be inspected annually for the first two years following initial assessment to establish a clean track record.</p> <p>Scheme sector or individual scheme operators may choose to adopt more frequent inspection periods, where they consider that there is a need to go beyond the minimum requirements to ensure compliance with the Building Regulations.</p> <p>The scheme operator shall document its surveillance process and keep records of all surveillance made in line with the requirements in EN 45011.</p>
13.	Scheme operator to have effective sanctions in place for dealing with non-compliance with the Building Regulations and/or a breach of scheme rules by members of the scheme.	<p>The scheme rules shall set out the range of sanctions to be applied in particular circumstances, including referral to the local authority where appropriate and, in the last resort, termination of membership for refusal to comply.</p> <p>Provision shall also be made for an appeal against any sanctions imposed.</p>
14.	Scheme operator to use an agreed mechanism to make available to other competent person schemes and other interested parties (e.g. LABC & relevant Government Departments) the names of former members whose membership has been terminated by the scheme and the reason for termination.	<p>This applies where the reasons for termination of membership relate to non-compliance with the Building Regulations or a breach of scheme rules. The names of such former members shall remain available for a period of at least two years.</p> <p>All members must be made aware of this condition on initial registration and/or renewal of membership.</p>

	Section 3 The scheme operator and its customers	
15.	Scheme operator to keep and publish membership lists and the type(s) of work for which members have been assessed as competent.	<p>This information shall be published on the scheme's public website and the competent person schemes' website, which will allow customers to find a competent installer to carry out work or to check if an installer is a member of a scheme.</p> <p>Publication is subject to the agreement of members, as a condition of membership, which must be sought on initial registration and/or renewal of membership (e.g. via a tick box).</p>
16.	Scheme operator to have a robust and publicised complaints procedure.	<p>The complaints procedure must cover those relating to non-compliance with the Building Regulations, but may include other types of complaints from customers (and members) relating to the scheme.</p> <p>The stages of the scheme's complaints procedure shall be set out in detail, at a minimum on its public website, so that those wishing to use the procedure are aware of the stages. The procedures shall be consistent with the principles relating to complaints management of the Office of Fair Trading Consumer Codes Approval Scheme.</p>
17.	Scheme operator to arrange to provide customers with appropriate financial protection to put work to dwellings right, which is non-compliant with the Building Regulations, where the original installer cannot do so.	<p>Financial protection must be provided, not offered, for a minimum of six years for work to dwellings. But where a manufacturer's product guarantee is for a shorter period, this period will take precedence for that product.</p> <p>Type of provision may vary from scheme to scheme and sector to sector. Possible mechanisms include guarantees, insurance-backed warranties or, where appropriate, professional indemnity insurance.</p>
18.	Scheme operator to require its members to remain responsible for ensuring that all scheme work carried out under a contract with the customer is compliant with the Building Regulations.	<p>This applies in particular where some of the work is sub-contracted to a third party and shall be stated in the scheme rules.</p> <p>The scheme rules shall also state that members must ensure that sub-contractors are competent to carry out the work they are sub-contracted to do.</p>
19.	Scheme operator to take measures to ensure that it is notified by members of all completed work required under the scheme and to forward to all customers a certificate of Building Regulations compliance.	<p>The scheme operator shall have documented systems in place to ensure that members are notifying all jobs carried out under the scheme, in line with regulation 20 of the Building Regulations 2010. The scheme operator should receive notifications well within time to ensure that it meets the 30 calendar day deadline for giving compliance certificates to customers.⁵</p>

⁵ This does not apply to any pressure testing scheme authorised under regulation 43 of the Building Regulations 2010.

	Section 4 The scheme operator and DCLG / local authorities	
20.	Scheme operator to provide the information DCLG requires in order to carry out its oversight functions, both on a regular basis or <i>ad hoc</i> as required.	DCLG will specify with all scheme operators the regular information needed for its purposes, which may be published on its website. This is likely to include: <ul style="list-style-type: none"> • provision of a periodic report on: membership numbers; number of work notifications made to local authorities; and number of formal consumer complaints and their outcomes; • financial information annually from the scheme's audited accounts, as appropriate; and • information from UKAS reports on the scheme accreditation, as appropriate (DCLG may request this direct from UKAS).
21.	Scheme operator to take measures to ensure that it is notified by members of all completed work required under the scheme and to forward this information to the relevant local authority in the format agreed with LABC.	As under condition 19, scheme operators shall have documented systems in place to ensure that members are notifying all jobs carried out under the scheme, in line with regulation 20 of the Building Regulations 2010. The scheme operator should receive notifications well within time to ensure it meets the 30 calendar day deadline for transfer of information to the local authority. ⁵

Department for Communities and Local Government (DCLG)

Current authorisation criteria for operation of a competent person scheme under the building regulations

The expectation is that an applicant must demonstrate ability to comply with all the criteria but the weight attached to each would depend on the particular circumstances in the sector concerned and the requirements on that sector in the Building Regulations:

- financial and accounting probity and viability with a proven track record in the relevant field
- demonstrable understanding of what is involved in managing a scheme of this type and the administrative systems to do so
- sufficient knowledge of the Building Regulations by both scheme organisers and scheme members
- absence of, or methods for avoiding, conflicts of interest between the commercial interests of sponsoring or member organisations and management of the scheme
- a minimum standard of technical competence, independently assessed where practicable, for all prospective members of a scheme. Such standards will vary from sector to sector and maybe based on National Occupational Standards, formal qualifications, and/or experience, taking account of any British or European standards
- effective means of vetting prospective members against the minimum standard
- robust procedures in place to deal with complaints from members and disputes between members and customers
- a rigorous system of ensuring and monitoring members' compliance with the Building Regulations
- effective sanctions in place for dealing with non-compliance by members of the scheme
- system for ensuring that certificates of compliance are issued to consumers
- where information on work completed under the scheme is to be sent to local authorities, appropriate methods to ensure rapid transfer of the information
- adequate consumer protection through an insurance-backed warranty, professional indemnity insurance or bond
- commitment to publicising the scheme and its rules as widely as possible, including a list of the names of members of the scheme and the type of work for which they have been assessed as competent
- commitment to allow the Department to monitor the scheme periodically to ensure that it delivers compliance with the Building Regulations and is following the scheme rules
- commitment to comply with the proposals in the *Building Regulations Competent person self-certification schemes: Consultation paper*.

Building Regulations: Competent person self-certification schemes

Extract from Analysis of responses to consultation⁶

Introduction and overview of responses

Background

1. CLG issued a consultation paper, *Building Regulations Competent Person Self-certification Schemes*, in December 2009. Its purpose was to seek views on proposals for changes to the administrative provisions for approval, monitoring and quality assurance of schemes. The changes proposed were designed to improve the level of compliance with the Building Regulations and to increase consistency across the schemes. The consultation period ended on 19 March 2010.

2. 47 bodies or individuals responded to the consultation, falling into categories as follows:

	Number of respondents
CP scheme operator	11
Building control body	10
Professional or trade body	16
Other	10
Total	47

3. A complete list of those who responded is at Annex 1.

4. This summary of responses has been prepared by IHPC, an in-house policy consultancy based in Department for Transport and providing a service to all of CLG, Defra, DECC and DfT.

Overview of responses

5. The consultation paper posed 12 questions, each inviting a 'yes' or 'no' answer. The number of respondents answering 'yes' and 'no' to each question is recorded in the table at Annex 2, and a fuller breakdown by respondent category is in the relevant section of the main report that follows. Respondents who elected not to respond in a yes/no format are recorded as 'neither', as are those who offered no response to the particular question.

6. A clear majority of respondents supported the Department's position on all issues where the consultation paper offered a view, ranging from 9:1 in favour of scheme operators offering some financial protection to consumers (Q6) to a bare majority who considered the Impact Assessment to be fair (Q11). However, crude analysis by numbers of 'yes'/'no' votes disguises some important reservations expressed by those who supported the Department's position in general terms, and a fair amount of common ground between the 'yes' and 'no' camps on some issues.

7. In general, there was markedly less support from scheme operators than from other respondents for the Department's proposals. Even within this category, however, it was only on Q11 (Impact Assessment) that a majority opposed to the Department's proposals.

8. The proposal to require scheme operators to gain UKAS accreditation provoked the most attention and strongest views from respondents. For this reason it is dealt with first below, with other issues following the order of the consultation document.

⁶ Prepared by IHPC, 1 June 2010

UKAS accreditation

9. The consultation document notes that monitoring of CP scheme operation has hitherto been undertaken by the Department on an ad hoc basis, and that the Department would like to move to a more regular and standardised arrangement. The proposal is to require schemes to gain UKAS accreditation to standard EN 45011, and for UKAS to take on regular scheme monitoring.

10. A substantial majority of respondents supported this proposal. However, while there was wide consensus about the need to put in place effective scheme monitoring and quality assurance arrangements, views were far more mixed about whether this should be achieved through UKAS accreditation.

11. Four scheme operators strongly opposed UKAS accreditation. They argued that it would result in substantial additional costs which would take scheme membership beyond the means of smaller businesses and sole traders, and as a result lead to a major reduction in CP membership numbers. There were also fears that UKAS might impose a 'one size fits all' approach to monitoring scheme members' work in different sectors, which could result in a reduction in quality standards as well as an increase in costs in some areas.

12. Other scheme operators took a different view, arguing that UKAS accreditation was essential to remove unfair inconsistencies between operators and schemes. Some respondents argued that the Department did not have the right skills for monitoring scheme operation, and that, as the UK's national accreditation body, UKAS was the right body to take the job on. UKAS itself said that it would welcome this role.

13. Alternative propositions were that the CP scheme operators should collectively appoint and pay for a respected independent auditor, or for the auditing task to be opened up to a wider range of suitable bodies.

Core authorisation criteria

14. The consultation paper proposed changes to the criteria against which new competent person schemes are authorised, designed to bring more uniformity to the application and enforcement of criteria across schemes. It proposed a total of 22 core criteria.

15. There was no disagreement in principle that there should be an updated and common set of core criteria, and a broad measure of support for many of those proposed. Recurring general comments were that there should be adequate mechanisms in place to ensure compliance and that it was important that schemes operated to the same rules and standards.

16. Some of the criteria deal with issues covered in more detail in later sections of the consultation document. Of those not covered elsewhere, those that provoked most comments were:

- Criterion 5: membership growth. All of those who commented opposed the proposal that schemes should be required to commit to membership growth, on the grounds either that it was undeliverable, or that it would undermine a commitment to proper standards, or both.
- Criterion 2: scheme to be financially viable. There were suggestions that this rule should apply to the operator rather than the scheme, and related arguments for greater clarity about what constitutes a conflict of interest.

- Criterion 7: members of schemes to be technically competent. While there was of course no disagreement with this in principle, there were concerns – particularly from the glazing industry – about how it was to be measured.
- Criterion 10: requirement for effective sanctions. Several respondents wanted to see a common set of sanctions in place across schemes, and some looked to the Department for guidance.
- Criteria 18 and 21: certificates of compliance and notification of completed work. While BCB respondents attached particular importance to notification (criterion 21), a number of scheme operators commented that these requirements were ultimately outside their control.

Application process

17. The consultation paper proposes that a formal process should be put in place to deal with applications to operate CP schemes, and identifies an 11-step process.

18. Whilst there was general support for these proposals, respondents expressed some concern on two issues in particular. First, some respondents were concerned to ensure that a general invitation to express interest was issued when a new scheme was established. Second, a small number of respondents queried the role of CLG in the process of approving new schemes, arguing that UKAS should play a larger part.

Customer complaints procedures

19. All competent person schemes are already required to have in place a robust complaints procedure. The consultation paper queries whether the procedure should be strengthened through the introduction of a formal, standardised procedure, or whether the Department should go a step further and require full compliance with the OFT Consumer Code Approval Scheme, including independent arbitration.

20. There was almost universal agreement to the proposal to introduce a standardised complaints procedure, but a range of views on what this should cover, and whether it should include independent arbitration. Many respondents in the scheme operator category looked for greater clarity about the procedures envisaged, and suggested that a draft should be developed for discussion. Several respondents looked for compatibility with other requirements, such as ISO 10002 and Trust Mark.

Consumer financial protection

21. There is an existing requirement that all competent person schemes should include arrangements for offering consumers some form of financial protection in cases where members' work does not comply with building regulations, and where there is no redress against the member concerned because they have gone out of business. The Department would like to see the current arrangements strengthened, and the consultation document puts forward the options of (i) a more detailed specification of the minimum protection to be offered, or (ii) mandatory provision to cover customers whether or not they opt for it.

22. A small number of respondents rejected the whole idea of CP scheme consumer financial protection on the grounds either that such provision would change the role of scheme operators from certification to underwriting bodies or on the more practical grounds that the vast majority of consumers were not interested in such protection.

23. However, the large majority of respondents favoured the provision of some form of consumer financial protection. Of these, 57% thought that provision should be mandatory, applying regardless of whether or not consumers opted for it.

24. The main arguments for mandatory protection were that this was the simplest option and a potential selling point for CP operators. The main arguments of those who opposed mandatory protection were that it would drive up costs significantly and hence deter scheme membership, and that it was wrong in principle to deny consumers the opportunity to make their own judgments about whether or not to opt for this insurance.

Monitoring the performance of scheme members

25. Most competent person schemes are currently required to carry out random periodic monitoring of the work of their members, with a minimum requirement for an annual inspection of a sample of each member's completed work. The consultation document proposes (i) that this requirement should be extended as a basic requirement to all schemes and (ii) schemes should be allowed to move away from annual inspections to a risk-based approach where they have demonstrated their ability to operate such a system. This approach is expected to generate net savings of £71m at net present value over 10 years.

26. Respondents in general supported the proposal to extend the basic inspection regime to all schemes, including a requirement for annual inspections. There were, however, concerns expressed by those schemes currently operating with less frequent inspections that the requirement was excessive, and that existing schemes should be allowed to continue to operate tried and tested processes. A wider range of respondents warned against the danger of too rigid an approach, arguing that the kind of inspection regime that made sense for one type of work would not necessarily work well for others. There were also concerns expressed about the adequacy of current monitoring and about low levels of compliance, and an argument from one respondent in the professional and trade association category that all inspection work should be undertaken by UKAS.

27. While the majority of respondents favoured a move to a risk-based approach in appropriate cases, a significant minority did not. Many respondents from both camps supported a risk-based approach in principle, but wanted to see basic minimum standards adopted. Some argued that a requirement for annual inspections should be retained as a minimum, while others argued for a minimum 3-year cycle.

28. Concerns were also expressed as to how a level playing field between operators was to be maintained if some were allowed to adopt a risk-based approach while others were not.

Impact assessment

29. The consultation document anticipated that a net present value benefit of £23m over 10 years would flow from the proposals, made up of £75m savings offset by £52m costs. Views were invited on the underlying estimates as set out in the Impact Assessment.

Less than a half of all respondents supported the Department's position on this, with many respondents saying they were not in a position to offer a view. 7 out of the 11 scheme operators to respond said that they did not consider that the Impact Assessment offered a fair overview of costs and benefits. There were concerns in particular that moving to a risk-based approach to inspections would not in practice deliver the savings anticipated, and that the costs associated with UKAS accreditation would work out considerably higher.