

## Consultation on indicators for the Energy Efficiency Standard for Social Housing 2: Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **15 January 2021**.

By email @: [shr@shr.gov.scot](mailto:shr@shr.gov.scot)

Or post to: Scottish Housing Regulator  
Buchanan House  
58 Port Dundas Road, Glasgow, G4 0HF

### Name/organisation name

West Dunbartonshire Council

### Address

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Dumbarton

Postcode  
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Phone

### How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

### Are you happy for your response to be published on our website?

yes

### If you are responding as an individual ...



Please tell us how you would like your response to be published.

*Pick 1*

Publish my full response, including my name

Please publish my response, but not my name

**1. Is there anything not covered by the proposed indicators? (if yes, please explain)**

We need be aware of the challenge of more homes using electricity as a main source of heating.

Electricity is currently much more expensive than gas and by phasing out gas boilers we may be helping properties become more energy efficient and reduce their carbon footprint but this may not have the desired impact on household finances due the cost of electricity compared to gas.

Therefore an indicator could be added which seeks to address the fuel bill query, for example average anticipated saving on fuel bill.

**2. Are there any indicators that you feel are not appropriate and, if so, why?**

The current return requires us to report the amount spent on EESSH but EESSH2 will see a considerable increase in spend and therefore this indicator may benefit from being expanded to include cost per property and additional guidance on separating investment costs from EESSH2 costs to allow meaningful comparison, particularly linking to the above area of fuel poverty. This could also be beneficial to help understand where costs are proving prohibitive.

**3. Is there any information we ask for that you feel does not need to be included or that we have been missed?**

Reasons for exemptions are reported currently and we would support that continuing.

However, the change in wording which implies that a property which is as energy efficient as possible would comply with EESSH2, even if it does not comply with the other more technical requirements. This appears to be a change away from clear compliance/ non-compliance and may generate an uncertainty in reporting.

Thus there appears to need to be a requirement for an indicator which reports on the number of properties for which all reasonable efforts have been completed but they remain non-compliant with EESSH2. This would be separate from abeyances.

**4: Would you like to make any other comments or suggestions about our proposed indicators?**

The proposed indicators make sense but the language could be clearer.

For example by moving between meeting EESSH2 and EPC wording might be confusing. EESSH2 equates to EPC B or higher therefore could the language simply be how many properties per each EPC rating or within bands? e.g. A&B, C&D and E&F

**Percentage of homes below EPC band D;**

Does this mean EPC D and lower or EPC bands E&F? Based on D being the basic standard we would presume EPC E&F. Again might be worth simply asking for % of properties per each EPC rating or within bands e.g. A&B, C&D and E&F

**Anticipated temporary exemptions from EESSH 2 (for properties below EPC D); a**

Is this expected to be a percentage or a number? And if it is percentage, is it a percentage of the total homes or homes with EPC E&F? A number would be more straight forward and therefore should read number of anticipated temporary exemptions....

Secondly, why only anticipated exemptions for properties below EPC D and not for all those below EPC B? This may potentially link to our comments to question 3, feels inconsistent.

#### **investment in EESSH2**

As per above, unclear what this indicator relates to.

#### **Categories of Measures**

No mention of LED lighting

A switch from storage heaters to electric could potentially increase fuel poverty

**Thank you for taking the time to give us your feedback!**