

Alan Christie
Department of Energy and Climate Change
3 Whitehall Place
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9 September 2009

Dear Mr Christie

Consumer Focus welcomes the proposed changes to the SAP assessment to improve the accuracy of a tool that may increasingly drive the sustainability of consumers' homes, particularly through the provision of energy and heat saving programmes. We support the use of SAP measures to promote the behavioural changes needed to cut energy bills and carbon emissions, but accuracy is key.

We also support the inclusion of weather projections in future revisions. Homes are now being built which will be occupied in 100 years time or more. They need to be future proofed to build in resilience to the projections of hotter, dryer summers and wetter winters – with heavier rainfall. Consumers will need homes which are inexpensive to keep cool, both for their own health and comfort, and to avoid rising energy bills and carbon emissions.

Inclusion of a cooling load should be incorporated for this reason, using an appropriate calculation of the impact of thermal mass alongside estimated air conditioning use.

Consumer Focus is undertaking research to understand the impact of climate change on British consumers, and despite the relatively small land mass, there are clear regional variations. We therefore believe that SAP ratings should be made regionally dependent, particularly as the latest climate projections provide more accuracy than the current approach. We also suggest consideration is given to regional variations between the number of occupants and floor area, as this is likely to be higher in urban areas.

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In relation to appliance use, we recognise that this is a growing area of energy demand. However, we know that consumers reject information if there is 'too much of it' and it is 'presented in a complex and unappealing format'. Consumer Focus is concerned that the incorporation of an appliance measure into the SAP assessment could result in confusion for consumers, particularly as the accuracy of ratings could be in doubt as appliances are revalued and as unsustainable choices are edited out by regulation. However, energy use by appliances is a concern and we would be interested in exploring this issue further.

Yours faithfully

Liz Lainé
Senior Policy Advocate