



THE NATIONAL ENERGY FOUNDATION

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NEED Consultation
Statistics Team
Department of Energy and Climate Change
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Consultation reference 13D/298

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Dear Sirs

National Energy Efficiency Data Framework: Making data available

We are making a formal response to the consultation document on making data available from the national energy efficiency data framework. The National Energy Foundation is an independent charity that has been actively involved in energy efficiency and – in particular – in the use of energy in buildings since 1990, and relies of high quality data to underpin many of its activities. We are therefore responding as an NGO.

Our responses to the consultation questions are as follows:

1. Do you agree DECC should release anonymised NEED data?

Yes. If the UK domestic housing stock is to be brought up to an acceptable level of energy efficiency, it requires interventions supported by robust data to ensure an efficient allocation of resources.

2. Do you agree with the proposed approach to publishing two separate dataset for different purposes?

No. There is a danger that by filtering down the smaller set to 20,000 records unintentional biases will appear in the data. Although 20,000 homes may sound like a large number to start with, the number of properties with a particular combination of characteristics (eg. oil heating and solid walls in a specific local authority) could become quite small, leading users to make incorrect inferences about data. This risk is exacerbated by certain data elements being excluded from the public use set as proposed, such as thickness of loft insulation.

3. In relation to i) the public use dataset and ii) the end user license dataset, what are your priorities for variables in the dataset?

a) We comment in the table on the next page on those items where we would not agree with the table on pages 14-17 of the consultation document.

Variable	Comment
Economy 7 flag	We believe that this would also be of value for the public use dataset
Energy Efficiency Band	We agree this is a high priority. Given that certificates are valid for 10 years, we would also welcome the year of the certificate. Without this data, some of the other time referenced data is of lesser value.
Mains Gas	We think this would be useful in both data sets, especially as actual consumption data may not be provided for something like 25% of homes connected to the mains.
Loft insulated thickness	This is an important indicator and should be included in both datasets. In our view it is more important than whether the work has been done professionally or not.
Wall construction	This is an important indicator and should be available in both datasets.
Environmental Impact Band	This is potentially useful, but would not be as useful as the SAP generated by the EPC rating. It could possibly be omitted if Government is concerned about the size of the data set.
Cavity Wall insulation year	We are not convinced of the importance of this, as the year of retrofitting is less relevant than the materials used (if available) or the age of the property to which it was fitted (which will determine the likely characteristics of the cavity). It is unlikely that there will be a programme to reinstall CWI into cavities that have already been filled, as most suffer low degradation over time. This could easily be omitted from the public use dataset; its main value is as an indicator of whether it has been done since the most recent EPC was issued.
Loft insulation installed and year	Although the former should be reported, given the high level of DIY installations, the data will not be representative of the housing stock and needs to be treated with caution. Although some early professional retrofits may be to a thinner level than currently recommended and so potentially available for top up, this is a relatively unimportant statistic and could be omitted from the public use dataset, except as an indicator of whether it has been done since the most recent EPC was issued.
Solid wall insulation	While this is potentially useful, we note that installed numbers through government schemes have been low, except on large scale public housing projects, so the data may be of limited value. As before, we see limited need for the year of installation to be reported as part of the public use dataset.
New boiler	We are unaware as to whether Gas Safe/CORGI would be able to provide additional information on installations, but if the energy efficiency rating (or a model number that could be converted to the rating before release to the public or licensed users) then this would be of great potential value.
Region	We believe that the former Government office regions have low value and could probably be omitted.
Local authority	In contrast, we believe that data by local authority is of most practical use, and should be able to be accessed by a wide range of stakeholders such as community groups.
Output area classification	We would not object to its inclusion in the end use licence dataset, but see it as being of relatively low importance.
Fuel poverty indicator	This could be useful information for those targeting the most vulnerable residents, and should be included.

b, c) Our comments in the table above identify some areas where we think variables are more (or less) important than indicated in the consultation document. In particular we would stress that we regard loft insulation thickness and wall construction as being important, and more so than whether they have been installed under a government scheme, given that the latter will at best only offer a partial view of what has been done.

d) As indicated in the table, we believe that the year of the EPC is important data to help assess the robustness of other data drawn from it.

We agree that floor area band (from the EPC) should be a priority, but think that adding number of bedrooms would be beneficial as an alternative size metric.

Where data is available on small-scale renewables, we believe that it could be of value to include these alongside energy efficiency indicators.

f) We believe that the relative importance would go percent in fuel poverty → index of multiple deprivation → output area classification.

4. Proposed Bandings for variables

Gas and Electricity

While we would welcome detailed bands, we also accept that in terms of data analysis, having too much detail (but not individual numbers) can be difficult to handle. We also note that average household consumption varies greatly between gas and electricity, so that it may not be appropriate to use the same bandings for both fuels. So, for example, while 1,000kWh or 2,500kWh bands might be appropriate for gas, narrower bands might be more appropriate for electricity, of say 500kWh. We accept that whatever bands are used, there may be some outliers with valid data, and that for this reason a narrower banding for the first (say) 5,000kWh could be used, with a wider one up to the 50,000kWh limit.

It would also be valuable for excluded properties to indicate whether their data has been omitted due to being above the 50,000kWh threshold, below the 100 kWh threshold, or missing completely.

EPC Band

The EPC rating is already a blunt tool, and we would strongly advise against grouping it further; in other words we would select option (b). Removing the CO₂ indicator could permit use of the full bands.

Main fuel

We strongly prefer (b) – gas, electricity, other

Wall construction

We strongly prefer (b) – cavity, solid, other

Year of Construction

We would be content with fewer bands, but would see value in an additional band at either end, reinstating the pre-1900 and the post-2007 bands.

Loft insulation bands

We would prefer bands, rather than a simple cut-off at 150mm (ie. option (a) is recommended).

Years of installation

Although not critical, we would suggest using calendar years for consistency.

6. Do you agree with the proposed approach to publication and access?

While we are broadly in agreement, we are concerned that the 20,000 record database may be insufficiently large to be representative of some of the less common types of home, and could impose an significant administrative burden (or lack of reliability) in its extraction from the main database. This might be partially overcome by increasing the size to (say) 50,000 or by releasing sub-sets of the main database filtered by (say) local authority. If this required a basic user licence to be agreed, including the commitment not to use the data for the excluded purposes, then that should not be a problem in itself.

7. If you are a potential user, please tell us how you think you would use these data.

We would use data primarily for research into the most effective ways of improving the use of energy in domestic buildings. Some of this would be for internal or public reports; at other times it would be done in our work with local authorities, housing associations and other housing stock owners.

If you would like further information about this response please contact the undersigned. We have no objection to this response being placed on the public record.

Yours faithfully

IAN BYRNE
Deputy Chief Executive
National Energy Foundation