

DECC-EEPB Microgeneration Government-Industry Contact Group

Consumer messaging and protection sub-group meeting, 22 November 2012

	MGICG	Organisation	Name		
1	N	BEAMA	Simon	Harpin	SH
2	N	Bondpay (+ on behalf of Kinnell Group)	Nick	Egdell	NE
3	N	British Gas	Gavin	Baillie	GB
4	N	Chimera Insurance	Vince	Linnane	VL
5	Y	Consumer Focus	Peter	Broad	PB (CF)
6	N	Correlation Risk Partners Ltd	Iain	Bird	IB
7	Y	EEPB (chairing)	Mark	Brown	MB
8	Y	EEPB (notes)	Luke	Smith	LS
9	Y	Energy Saving Trust	Ian	Cuthbert	IC
10	Y	Energy Saving Trust	Rachel	Carss	RC
11	Y	Gemserv	Kunal	Sharma	KS
12	N	Gemserv	Julie	Coombes	JC
13	Y	MCS	Gideon	Richards	GR
14	Y	Micropower Council	Emma	Piercy	EP
15	Y	REAL	Ciaran	Burns	CB
16	N	REIGA	Nigel	Poole	NP
17	N	SE2	Liz	Warren	LW
18	Y	Solar Trade Association	Paul	Barwell	PB (STA)
19	N	Which?	Simon	Osborn	SO
20	N	YouGen	Cathy	Debenham	CD

Apologies			
1	BEAMA	Kelly	Butler
2	Consumer Focus	James	Court
3	DECC	Paul	Rochester
4	REAL	Mark	Cutler
5	HHIC	Chris	Yates
6	NHBC	Neil	Smith

As a subgroup of the Microgeneration Government-Industry Contact Group (MGICG), the primary aim of this meeting is the galvanise action through agreement of an appropriate messaging and protection related action plan. The notes hereon in are therefore not a detailed account of exactly what was said, rather a log of areas covered. The action plan distributed with these notes found on the EEPB huddle web space here –

<https://eepb.huddle.net/workspace/20902480/files/#/folder/20902485>

1. Introduction

MB outlined the background and purpose of the consumer messaging and protection subgroup and referred to IC's framework document distributed prior to the meeting (hosted here for information – <https://eepb.huddle.net/workspace/20902480/files/#/folder/20902485>). It was stressed that the primary aim of the roundtable was to appoint leads on the four identified action areas;

- Core consumer messages
- Consistency of data
- Consumer protection
- Advice and information

2. Presentation

Prior to delivering his presentation, IC highlighted his involvement in the MGICG, the MGICG consumer messaging workshop held in January 2012 and the Micropower Council's 'Microgen Messaging Group'. IC then delivered his presentation to introduce the proposed action framework derived from sources such as MGICG January workshop sessions, experience of the MPC group and ESTs own insights and wider market research. Non action related debate was had around the validity of some research items, in particular the 'levers and barriers' and the 'trusted sources' - both of which being very subjective topics where there are a lot of conflicting studies (depending on wording of the question, nature of response options, stage that the respondent is in the consumer journey etc.). CD cited research recently undertaken by Delta-ee which suggests that after upfront cost, insufficient fuel bill savings and the lack of a grant or subsidy are key reasons for consumers not investing in microgen. Full access to this research is a paid for service but an overview can be found here: <http://goo.gl/uWeCu>. Delta-ee has also undertaken work on behalf of the ENA Gas Futures Group to specifically investigate the 2050 pathway for domestic heat which can be found here: <http://goo.gl/kFeCW>.

Numerous additional points were raised during the presentation of the slides and these have been incorporated under the appropriate headings which were discussed in sequence over the duration of the meeting.

Action: IC to send LS the slides and explore whether the full EST survey results could be distributed alongside the meeting notes and the final action plan.

3. Framework item 1: Core Consumer Messages

The framework proposes **8 core consumer messages that industry could jointly promote**. There was wide agreement on the principles of this action but GR and others suggested that clarity is needed on the types of messages being portrayed, who they're intended for and how they are expected to work. GR gave an example of consumer attitudes toward biomass in a primary school when it was suggested the wood pellets would come from Grenoble. How the message is given and how it's received/interpreted is vital. GR suggested more 'clinical' statements specific to certain technologies may be more viable. LW highlighted distinction between facts and data vs. messages and feelings – consideration of what's more valued to consumers must be taken in to account when determining the messages.

All agreed the tone of the messages would be aimed directly at consumers rather than for installers to put across. However, reference was also made to previous elections where Conservatives produced a “little blue book” for all of its representatives. This listed the messages they wanted to get across but left the ‘exactly how you do it’ bit up to the individual. CD indicated that at a local level SMEs tend to interpret messages their own way but guidance is always helpful and will ensure consistency and credibility.

All advocated the need for agreement on the end user messages to aid consistency and that with critical mass, robust messages will also help shun the cowboys.

With an ultimate aim to help overcome the barriers to industry, MB called for volunteers around the table interested in contributing to developing the messages. The deliverables agreed are as follows;

Task	Key stakeholders and channels	How will success be measured?	Delivered by*
Core messages to be agreed, finalised and distributed to organisations that consumers trust.	<p>Messages for the benefit of industry as a whole but key channels are;</p> <ul style="list-style-type: none"> - Consumer advice organisations - Installers - MCS and REAL - Government and Local Authorities - Independents 	<p>Core messages agreed by MGICG.</p> <p>Messaging communicated to identified relevant groups as part of wider communication which includes ‘advice tree’ (see advice and information)</p> <p>Commitment from providers of advice to disseminate the agreed messages</p>	<p>Lead: EST</p> <p>Support from: MCS REAL Yougen BEAMA Which? SE2</p>

*Organisations who volunteered to take forward the action at the time of meeting

3. Framework item 2: Consistency of Data

There is wide agreement that ensuring consistency of data is a complex and difficult goal. What may be more achievable is for key bodies to be more transparent with their figures i.e. what data has gone in and what’s the context of the data that has come out. This is particularly true of **savings calculations** – consumers need to know exactly how certain savings figures have been calculated, including what assumptions have been made.

IC and GB highlighted that the calculation used is dependent on the stage in the consumer journey. Further along the line calculations get more advanced and become more tailored to individual circumstances. IC pointed to a past meeting with DECC where they’ve suggested that methods used should be more consistent and realistic, with SAP being the preference so that it links in with everything else. All agreed this may be achievable on a technology by technology basis. GR and PB (STA) reiterated the need for **consistency and transparency** of any tools – STA’s solar calculation tool **declares all the assumptions** as a printable sheet.

At present DECC, STA, EST and Which? all use marginally different fuel costs figures which leads to large differences in the outputs. All agreed consistency could be better achieved in this area and EST fuel cost figures were referred to as a good reference point. PB (STA) added that perhaps standard

low, medium and high scenarios could be signed off by the group for all to use in an industry approved calculator – SAP, T*SOL or whichever is deemed most appropriate. PB (STA) also suggested consulting FSA on methods of economic calculation

IC told the group that the savings figures from the EST data services team are to be published in December 2012.

MB summarised that there is a **clear disconnect with assumptions being made, both from a financial and a performance perspective**. A quick win action on data consistency therefore would be a document that clearly specifies assumptions (EST values being a good starting point). Married to this, the **ideal longer term scenario would also be to agree on a standardised method for demonstrating performance and savings**. However, since this may be difficult to realise in practice, a published document that explains the differences between the common calculation methods and provides reasoning for the discrepancies may be a realistic alternative.

SO suggested Which? may be prepared to be involved as a colleague from the Which? money research team, Gareth Shaw, has worked toward developing his own calculations in the past.

Action: IC/RC to circulate the EST savings figures to the group prior to their publication for awareness/consultation.

The deliverables agreed are as follows;

Task	Key stakeholders and channels	How will success be measured?	Delivered by
MGICG to agree on industry 'standard' performance and saving calculations	All agreed this would be difficult to achieve. Key channels are; - Consumer advice organisations - MCS & REAL - Trade Bodies	Document produced to identify where there are inconsistencies and to conclude suitable technology specific performance and savings calculation tools which should become industry endorsed. Cross referencing between identified conventions and the assumptions on web site and tools	Lead: EST Support from: STA MCS BEEMA MPC Which? (potentially finance)
Determine standard low, medium and high standard calculation scenarios and script these into an industry approved assumptions list for each of the chosen calculation methods.	Key channels which use the tools regularly are; - Consumer advice organisations - MCS & REAL - Trade Bodies - DECC	Industry approved, calculation method specific, assumptions document produced to accompany figures issued to consumers. To include standard fuel cost figures, proportions exported, system efficiencies and so forth. Buy in and promotion of the document amongst key stakeholders and the MGICG	Lead: EST Support from: STA MCS BEEMA MPC Which? (potentially finance)

Establishing the process for collecting and publishing cost data	Key handlers of such data are; - MCS - REAL - EST - Ofgem	MCS database amended to collect cost data when registering installations Data published no less frequently than quarterly Cost data to be made accessible and thus consistently published.	<i>MCS and EST already in the process of doing much of this. MCS, REAL, EST and Ofgem to provide clarity to the group on this.</i>
To agree common methodology for presenting financial appraisal information	Transparency discussed as key for the benefit of industry. Key channels are; - Consumer advice organisations - Trade bodies (ultimately installers) - Government and local authorities	Guidance produced showing agreed methodology, guidance on use and caveats. Consultation and, if possible, support from the FSA	Lead: EST Support from: STA MCS

4. Framework item 3: Consumer Protection

There is already a considerable amount of consumer protection in the industry but all agree that very **few consumers are aware of their basic rights** and a high proportion of **organisations don't understand their legal obligations**. GB suggested that on this basis, **what your rights are as a consumer should be a core message**.

Group consensus that a quick win would be a signed off document that lists all consumer rights. EEPB and BEAMA have made a start on such a document in the past and this could be recirculated. The Energy Saving Trust's FAQ section and MCS also provide detail on consumer protection, including [REAL's customer complaints process](#).

Action: LS to circulate the draft MGICG consumer protection document.

KS highlighted that MCS is currently in the process of putting in place **insurance backed guarantees** for microgen technologies and these will be in place between January and April 2013. CB stated REAL code also already requires insurance backed guarantees and that they spot check 1 in 3 new members on this and heavily police.

VL stressed **need for industry ring-fenced criteria on consumer protection**. At present establishment of protection is very ad-hoc and clear criteria could define, for example, an ombudsman, the need for insurances and minimum standards etc.

Group action framework presented by IC proposes **7 core consumer rights messages** that could be signed off by the MGICG and promoted. All agreed on the principle but further work is needed to

ensure these messages are the right ones – GR picked up on misleading wording for item 7 concerning a consumers rights if an installer goes out of business. There was group consensus that the accuracy of the statements is critical, particularly from a legal perspective. NE suggested one approach to ensure the messages are put across to consumers and to ensure their awareness is that MCS adopts a ‘two touch process’ rather than a single post installation registration approach. MCS could engage with the consumer at pre-installation phase to “inform and prepare” and then again after the installation as MCS does now to “confirm and record”. CB iterated that all consumers perhaps need to know is that installers are MCS and REAL registered and that this means ‘X’ in terms of protection.

In terms of **complaints logging**, the group acknowledged this is presently disjointed. KS stated Gemserv currently host a central complaints log for the industry but this does not link directly in with REAL or any other trade association complaints processes. There’s an industry wide issue of obtaining sufficient evidence to process many of the complaints. Group concur some further work could be done on improving elements of this from a consumer and industry perspective – this may be achieved through better distinction of roles e.g. REAL = contractual complaints, MCS = technical complaints. SO indicated Which? would be happy to endorse a robust complaints procedure on the Which? website, as would others.

The deliverables agreed are as follows;

Task	Key stakeholders and channels	How will success be measured?	Delivered by
Agree a set of core consumer rights messages for industry to endorse.	Messages for the benefit of industry as a whole but key channels are; - MCS - REAL - Trade Bodies - Consumer Messaging Organisations	List of consumer rights agreed and group consensus on the best approach moving forward in light of existing consumer protection material.	Lead: MCS Support from: MGICG Consumer Focus Correlation Risk Partners Ltd Chimera Insurance Bondpay/Kinnell Group + others tbc
Assessing the impact of Green Deal on consumer rights	MCS/Gemserv	Amendment/additions made to core consumer rights outlined	<i>MCS/Gemserv already on with this.</i>
Publish consumer rights on MCS and REAL web site	MCS and REAL, pending agreement and development of the rights.	Publication on key stakeholder web sites and communicated to “trusted” organisations	Lead: MCS and REAL <i>Once consumer rights messages have been agreed.</i>
Set up an easy way to report rogue installers	- MCS - REAL - Trade Bodies - Consumer Messaging Organisations	A straightforward link on MCS/REAL home pages to report rogue installers	Lead: MCS/Gemserv REAL

Develop a glossary of terms in relation to consumer protection	<ul style="list-style-type: none"> - MCS - REAL - Trade Bodies - Consumer Messaging Organisations 	Publication and dissemination of key terms in relation to consumer protection. Issued to key stakeholders involved with consumers (installers, GD assessors, EST, Which? Consumer Focus etc.)	Lead: MCS Support from: tbc
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5. Framework item 4: Advice and Information

IC presented **Advice Tree** proposal which was well received by the group. LW suggested an added layer to include is the internet – people interchange between stages and the structure isn't as rigid as illustrated. All acknowledge there is a considerable amount of advice and information out there but what's needed is a widely endorsed starting point to aid those less aware of the information options open to them. An advice tree that the industry points to would enable this.

PB (STA) indicated that STA are soon to launch a consumer facing **forum** on its website to give consumers a more personalised source of advice and guidance. CD indicated [YouGen blogs](#) are produced on this basis, linked directly to common enquiries and that other popular forums include [Navitron](#), the [Green Building Forum](#) and the [AECB forum](#).

IC and MB agree that there is plenty of existing technology specific groups where certain new and existing advice mediums can be consulted about as part of this exercise. IC suggested identifying the appropriate groups and gaining their permission to act as 'information conduits' would be a good sustainable way of ensuring advice and information being published is fit for purpose – especially given there is minimal resource to appoint any single organisation to lead on the production of guides as EST once did. PB (STA) suggested that, providing the timing was right and the message was clear, collective funding could be sought from industry to promote certain aspects.

Task	Key stakeholders and channels	How will success be measured?	Delivered by
Identify existing subject specific groups to review and develop advice and information	<ul style="list-style-type: none"> - Consumer facing organisations - Trade Bodies - EEPB 	Establish/tap into existing subject specific groups e.g. STA solar PV working group	Lead: EST Support from: EEPB MPC MGICG

Agree on consumer advice providers and create a lattice of web sites	Group wide agreement on development of the 'advice tree' for the benefit of whole industry.	List of web sites published and shared with key "trusted" organisations. Lattice produced with organisations agreeing to link to each other's web sites.	Lead: EST Support from: Consumer advice organisations tbc
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Summary of actions

Section	Action	lead
2	IC to send LS the slides and explore whether the full EST survey results could be distributed alongside the meeting notes and the final action plan.	IC/LS
3	IC/RC to circulate the EST savings figures to the group prior to their publication for awareness/consultation.	IC/RC
4	LS to circulate the draft MGICG consumer protection document.	LS
-	All meeting participants and volunteers to contribute to the identified action areas on Huddle with the appointed leads.	All