



Department for
Business, Energy
& Industrial Strategy

Facilitating energy efficiency in the electricity system

Call for Evidence Summary of Responses

December 2020



**TOGETHER
FOR OUR
PLANET**



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Executive Summary

This Call for Evidence (CfE), which ran from 22 July 2019 to 25 September 2019, sought views on market barriers to energy efficiency in the UK, and how we can create new markets for energy efficiency, securing its role in the wider energy market, contributing to flexibility, and becoming a reliable alternative to increased generation and network reinforcement. It built on previous CfEs on 20% business energy efficiency target and domestic energy efficiency; government has already acted on a number of the suggestions e.g. non-domestic Minimum Energy Efficiency Standards (MEES) consultation and Boosting Access for SMEs to Energy Efficiency (BASEE) aggregation. We also note the work in the smart systems team to implement the recommendations from the Energy Data Taskforce to improve the availability and interoperability of energy data. This is likely to have direct impact on many of the barriers identified in this Call for Evidence.

In addition to responding to the specific questions in the Call for Evidence, respondents made a number of over-arching comments, covering:

Vision

- Significant role for government in strengthening existing regulations and schemes and having a clear trajectory toward Net-Zero.
- The increased pressure on the electricity grid in the future (given electrification of heat and transport) and the importance of innovation, energy efficiency, flexible energy generation and Demand Side Response (DSR).
- Significant role of network and system operators and Ofgem to facilitate energy efficiency in the market (for example in approach to energy efficiency in RIIO2 and Targeted Charging Review).
- Significant role of smart meters and the data they provide to understand energy-using behaviour, maximise utilisation of the network, evidence the impact of flexibility projects and facilitate energy efficiency project development and investment.

Buildings

- The key role of minimum standards and the importance of tightening obligations and standards on new homes, retrofits and businesses (Energy Savings Opportunity Scheme strengthening).

Market building

- View from respondents that more needs to be done to boost the market, including increasing demand for energy efficiency measures

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- The need to focus on standardisation, aggregation, data and encouraging lenders
- The key role a market facilitator could play in aggregating energy efficiency projects and informing consumers of the opportunities available
- Significant role behaviour change could play alongside installation of physical energy efficiency measures

We will continue to work with stakeholders to develop potential options to incentivise Electricity Demand Reduction (EDR) projects and work towards creating a mature market with a view to consulting on these.

Introduction

Energy efficiency can make a valuable contribution to the government's objectives to move to cleaner economic growth and to reach net zero emissions by 2050. Electricity demand reduction offers a cost-effective alternative to peak generations and investment in building additional electricity and gas networks. However, there are significant challenges in incentivising energy efficiency measures and enabling projects to extract sufficient value from the markets and systems that benefit from electricity demand reduction.

Previous attempts have been made to develop market methods to incentivise electricity demand reduction. The Electricity Demand Reduction (EDR) pilot ran in two phases delivered across the 2015-16 winter peak period to test whether projects that delivered lasting electricity savings at peak could in future compete for funding with generation, demand side response (DSR) and storage in the GB Capacity Market. Savings could be made by improving motor or pump systems, replacing old light fittings with LEDs or making any other improvement to a building or electrical equipment which would deliver lasting peak time electricity savings.

In line with the published EDR evaluation findings, in most cases the pilot had a positive influence in accelerating projects, leading to the benefits of those projects being realised earlier than they otherwise would. The evaluation found that the EDR pilot design, may have made it difficult for organisation to develop new, fully additional projects. Interviews with potential participants found that this was due to a number of factors: the limited time for applications to be made; being a pilot rather than an enduring mechanism; low funding amounts as a percentage of total cost (meaning participating organisations tended to put low-risk, easily justifiable projects through the scheme); and the challenging process and data requirements for participation in the scheme (meaning most organisations did not think the rewards justified the costs).

Given the results of the evaluation and research into international schemes, EDR would be more likely to come forward if energy efficiency projects could leverage multiple sources of funding to enable energy efficiency to compete with generation, DSR and storage to reduce future capacity requirements. In doing so, it could reduce transaction costs through economies of scale and implement more cost-effective measurement and verification systems. In that context, BEIS launched BASEE in March 2019, a competition that makes available £6m of funding for innovative solutions that reduce transaction costs and encourage the take up of energy efficiency by SMEs. It also committed to exploring how best to facilitate energy efficiency in the electricity system.

BEIS ran a call for evidence between July and September 2019, seeking stakeholder views on the barriers to establishing a thriving market in energy efficiency measures. We are grateful to the 37 individuals and organisations that gave their time to share their insights and experience with us.

Respondents to the call for evidence generally agreed with our characterisation of the issues and challenges to facilitation of electricity demand reduction projects. The key issues identified were a lack of universal monitoring and verification of energy efficiency measures (and the key role smart meter data could play in this), low consumer incentive for investing in energy efficiency due to high upfront costs and uncertainty of return on investment, and lack of a market facilitator to inform consumers and aggregate projects. The responses are examined in more detail in the following section.

We will continue to work with stakeholders to develop potential options to incentivise EDR projects and work towards creating a mature market with a view to consulting on these.

Methodology

In total 37 responses (summarised in Annex 1) were received; however, respondents did not always answer all the questions. Therefore, numeric categories are used to explain the number of respondents that gave views or agreed/disagreed with assessments such as:

- Most is used when referring to more than 50 per cent of respondents to a particular question.
- Several or some is used when referring to 20-50 per cent of respondents to a particular question.
- A few or a small number is used when referring to 0-20 per cent of respondents to a particular question.

The Market for Energy Efficiency

1. Call for Evidence Question 1

Do you agree with the market barriers to energy efficiency investment described in the Call for Evidence? Do you think there are additional barriers?

Summary

- 1.1 Most respondents generally agreed with the barriers mentioned within the Call for Evidence.
- 1.2 Most respondents also referenced barriers preventing energy efficiency investment, these included:
 - High upfront costs and uncertainty of return on investment
 - Inability to measure effectiveness of a scheme
 - Lack of industry consensus around measuring and valuing energy savings through avoided consumption
 - Lack of long-term policy support for energy efficiency projects/measures
 - Low interest in and prioritisation of energy efficiency for households and businesses. Whilst energy costs remain relatively low for most, other investments are prioritised as more urgent or provide better return on investment
 - Inadequate skills and information to invest in energy efficiency
 - Complexity of measures and their opacity
- 1.3 A few also argued that incentives to undertake energy efficiency improvements in the private rented sector are misaligned, as costs are borne by landlords, while the primary benefits in terms of lower energy bills are realised by tenants.
- 1.4 An inability to access the energy efficiency market by SMEs was cited by some respondents as a significant barrier, with few actively managing their energy efficiency through lack of resource/skills within the business, lack of capital for investment and low prioritisation within their business agenda.
- 1.5 A few respondents suggested the possible negative knock-on effect supplier obligations may have had on the market for energy efficiency measures by causing the installation supply chain to rely heavily on subsidies through obligations, rather than developing more attractive products and finding ways to positively sell them to consumers.

2. Call for Evidence Question 2

What are the ways we can overcome the market barriers to energy efficiency investment?

Summary

- 2.1 Most respondents agreed it would require a mixture of incentives to promote energy efficiency improvements and tighter obligations on products, businesses and households
- 2.2 Several respondents highlighted the importance of energy data to demonstrate the benefits of energy efficiency
- 2.3 Enabling cross funding / stacking of revenues of measures was suggested by several respondents to increase incentive to invest in energy efficiency
- 2.4 Several respondents recognised the role of behaviour change and how energy consultants could be used in that process
- 2.5 Several respondents suggested mandating companies to take board-level decision on ESOS recommendations
- 2.6 Several respondents highlighted reducing the upfront cost of investment and the administrative burden when applying to incentive schemes and associated reporting
- 2.7 Several respondents referenced increased certainty of return on investments would encourage uptake within the market
- 2.8 Several respondents contested a clear trajectory towards Net Zero would help to provide policy certainty for investors

3. Call for Evidence Question 3

How can we leverage current markets to facilitate energy efficiency? For example, markets flexibility technologies can access such as the Capacity Market, National Grid Energy System Operators (ESO), balancing services markets, or Distribution Network Operators (DNO) tender for alternatives to network reinforcement.

Summary

- 3.1 Most respondents cited using time and location specific smart meter data to understand actual energy-using behaviour, maximise utilisation of the network, evidence the impact of flexibility projects and facilitate energy efficiency project development and investment at a community or regional level. It was suggested a market framework be created where energy efficiency is treated as equivalent to generation in the market, and that government should continue to mandate better quality metering across both industry and residential environments.
- 3.2 Several respondents highlighted the value in DNOs having an expanded role that centres around facilitating energy efficiency. It was suggested that enhancing the

- framework for RII0-ED2 (the price control for the energy networks which determines DNO revenues, set by Ofgem) would aid this. This would potentially present a wealth of opportunities for networks to find new, alternative ways of running the network, beyond the traditional method of network reinforcement. As part of this, it was suggested that reforming the weighting given to demand reduction projects in relation to social and environmental benefits, such as avoided CO2 costs and tackling fuel poverty, would leverage markets to facilitate energy efficiency. This would mean projects that were equivalent in MW savings, but also provided additional benefits towards fuel poverty improvement, (for example by deploying domestic energy efficiency measures) would be prioritised.
- 3.3 Several respondents also agreed that DNOs should be required to consider non-reinforcement solutions (such as energy efficiency) to offer a reliable and secure solution to overcoming network constraints. This should be technology neutral, allowing a range of technologies and approaches to compete on their individual merits.
- 3.4 A few respondents argued the need to allow and facilitate the aggregation of small behind the meter projects, such as those combining energy efficiency measures with energy storage. The use of a 50 or 100kW minimum project size in the EDR Pilot was viewed as challenging for energy efficiency participation.
- 3.5 Several respondents endorsed the conclusion that the Capacity Market is an unsuitable mechanism to provide an adequate incentive for energy efficiency projects under the restrictions trialled in the in the EDR Pilot, as it fails to reward the full set of benefits that energy efficiency delivers. It was proposed by a few that a competitive auction mechanism could promote new markets for energy efficiency, to support delivery of larger scale projects, as well as a demand reduction rebate. Commensurately, to incentivise energy efficiency measures for stakeholders which are less likely to be able to participate in an auction scheme, such as SMEs, local community energy projects and housing retrofit projects could increase access. This could be administered at a local level through DNOs but similarly to National Grid balancing services, which could include penalties if projected thermal efficiencies are not realised for the full duration of a project. It was noted regular auctions allow users to line up projects, forecast revenue and gives the market time to adjust with payments made on an annual basis for the lifetime of the technology, as opposed to a one-off payment.

4. Call for Evidence Question 4

How can we create new markets for energy efficiency? Please provide suggestions on how to design the different mechanisms.

Summary

- 4.1 Most respondents agreed a package of incentives for the owner occupier able-to-pay sector would encourage increased energy efficiency e.g. stamp duty or council tax reductions based on EE, VAT reductions for EE materials and products and green finance options.
- 4.2 A few respondents thought a sector deal would help prioritise energy efficiency

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- 4.3 Several respondents emphasised the need for policy certainty, including a clear trajectory toward net zero, specifically targets and roadmaps for businesses and public sector bodies to help energy efficiency become a priority. This would provide certainty for investors and strong energy efficiency regulations for both buildings and products, backed up by enforcement.
- 4.4 Some respondents argued that pay-for-performance needed to be more stringent. Incentives for those who can demonstrate savings achieved at the meter, not just those that are predicted to save based on models and theoretical savings calculations rather where compensation is delivered for the lifetime of the measure.
- 4.5 Several respondents highlighted the need to update public sector procurement practices to stimulate investment, through provision of standardised contracts and procurement frameworks to encourage greater uptake of energy service agreements.
- 4.6 An auctioning model for market participants was suggested by some to deliver energy efficiency improvements to households and businesses in 2020, alongside obligations.
- 4.7 A few respondents proposed DNOs and Third Party Intermediaries (including switching websites, energy brokers and energy efficiency advice provider), use their position to enhance knowledge and understanding about energy markets, flexibility, efficiency and how these elements may tie into a broader energy strategy.

Enhancing the Market for Energy Efficiency

5. Call for Evidence Question 5

What can we learn from other countries' electricity systems from an energy efficiency perspective?

Summary

- 5.1 It was generally noted that decarbonisation is a global challenge and international collaboration is key; the UK can learn lessons from other countries in this process, adapting ideas and technologies usually associated with countries with different climates, building stock, or other circumstances to a UK context, especially as climate-related changes require different energy solutions.
- 5.2 Most respondents referenced Germany and California as countries with good examples of energy efficiency programmes that have been successful with high-performance standards across the board.
- 5.3 Some respondents noted that German regulations mandate the implementation of energy efficiency measures for larger businesses where they have been recommended by an energy efficiency audit and where payback is three years or less. Under the obligations energy audits must be performed at least every four years and/or the introduction of energy management/energy performance systems, as is the case in the UK under ESOS. Tax based incentives for energy efficiency have also been successfully utilised in Germany, ISO 50001 is required for the reimbursement of the EEG levy in accordance with German Renewable Energy Sources Act (EEG) and those businesses implementing energy efficiency schemes benefit from a tax cap, mandating continuous improvement.
- 5.4 Germany was cited as an example country where public awareness has successfully played its part in the high prominence of energy efficiency. There is wide public support in Germany for a more efficient and greener energy supply which the respondent attributed to the prominence of energy issues in the national curriculum and the German media, as well as efforts to distribute accurate technical information on energy efficiency issues in a clear and simple language to non-specialist audiences e.g. in the form of brochures. A similar approach in the UK could help establish an energy culture where efficiency is valued for its benefits and the difference individual actions can make at the system level is well understood.
- 5.5 It was also noted by most respondents that California, USA, have high energy efficiency standards for equipment and buildings to overcome the California 'Duck Curve' where reliance on solar generation means the network can experience dips in its supply-demand balance. One of the solutions is flexible demand reduction, as it can be reliably metered and depended upon at certain hours, or at certain locations, year after year. This is allowing energy efficiency measures to play a more central role in efforts to tap demand response as alternatives to grid investments.

- 5.6 A few respondents also noted the use of software as a service for residential efficiency flexibility in the US, through 'pay for performance' programmes to potentially help with grid and network problems.
- 5.7 Some respondents advocated direct government intervention through policies and incentives as they have produced more tangible results than in countries where energy efficiency was left to the free market economy. Germany, Australia, Poland and some States in the USA are examples of where government intervention has achieved results, for example, 'Help to improve loans' in Germany and France have had a positive impact in making properties more energy efficient.
- 5.8 A few respondents noted that energy efficiency obligations have proved successful elsewhere. For example, Denmark and Italy placing energy efficiency obligations on gas and electricity distribution companies, as well as or instead of suppliers. DNOs are showing an increased interest in end use efficiency as part of the toolkit for delaying or avoiding network investment to bear obligations without impeding competition.

6. Call for Evidence Question 6

How could networks ensure that energy efficiency can compete fairly with other solutions as a potential alternative to network reinforcement?

Summary

- 6.1 It was generally agreed that demand side response through energy efficiency needs to be made more commercially attractive through government support and enabling market conditions.
- 6.2 Most respondents agreed that further real-world trials are needed to better calculate the rewards of energy efficiency versus network reinforcement or another mechanism such as flexibility alongside a better understanding of the potential role of networks in delivering energy efficiency improvements. It was suggested it may be preferable for an independent third party to be the energy efficiency delivery partner and that there are challenges in ensuring the benefits can be appropriately valued by the DNOs as an alternative to network reinforcement.
- 6.3 It was noted by a few that the current DSR reward framework is geared towards providing an incentive for large users to load shift away from peak demand whereas there should be payment from the networks for permanent load reduction to improve viability of energy efficiency projects.
- 6.4 Several responses suggested that network operators be mandated to fairly and appropriately consider energy efficiency within their cost and benefit analyses with respect to network reinforcement options. It was suggested that the price control mechanisms might need to be amended to take energy efficiency into account. In future, this role could become part of their areas of responsibility depending on how Ofgem reforms the role of Distribution System Operators (DSOs). It was proposed that government and Ofgem could integrate demand reduction and flexibility into the Forward-Looking Charging and Access review, and the RII0-2 network price control framework.

- 6.5 Respondents suggested that a market should be created for spare connection capacity where customers would be able to sell their additional capacity back to the network, where network needs are tendered on the basis that the customers involved are able to implement energy efficiency measures faster and at lower cost than the DNO could reinforce the network. In addition, DNOs could also reduce minimum threshold for flexibility to 50kW or lower to increase market access.
- 6.6 Several respondents referenced the need to leverage energy data and support adoption of smart meters, appliances and equipment and in turn, support the creation of a tool to track and verify collective savings through a UK register or bank/trading system.
- 6.7 A few respondents urged Ofgem to increase the available contract length for DSR (from 1 year) to put it on the same footing as other forms of generation and to lower the entry thresholds to allow more participants.

7. Call for Evidence Question 7

Are there potential benefits to combining energy efficiency and flexibility? How can we maximise the benefits?

Summary

- 7.1 It was generally agreed there are strong benefits to combining energy efficiency and flexibility. Given the direction of the energy sector towards greater distribution and decentralisation, local flexibility markets are likely to play a major role in how the energy system will be managed reliably and at least cost. Energy efficiency has the potential to participate and provide value in these emerging markets.
- 7.2 Several respondents suggested sector feedback has often cited complexity and a lack of transparency as a barrier to entry for flexibility contracts. A government policy structure built around enabling energy users to participate in markets could allow customers to become drivers for change in the energy system.
- 7.3 Several respondents highlighted the strong need for advanced metering infrastructure to quantify the actual time and locational impacts of energy efficiency projects, necessitating a wholesale shift to a performance-based valuation approach that is based on addressing grid requirements. This would include a cost effectiveness test designed to calculate the net present value of a program relative to the myriad costs that would be borne by program participants, ratepayers and other stakeholders. Meter-based pay-for-performance models can also simplify the execution of common valuation structures by allowing investments and outcomes to be synchronized around the value they are delivering instead of a prescribed technology-specific average estimate.
- 7.4 Several respondents pointed to DNOs addressing flexibility as well as energy efficiency. This would address permanent load reduction as opposed to simply shifting/reducing demand at peak times. It was argued that solely incentivising flexibility postpones the future infrastructure upgrade problem rather than solving it but combining energy efficiency and flexibility at scale may allow infrastructure upgrades to be avoided altogether, in turn enabling electrification at least cost. In

turn, it was suggested DNOs address efficiency in the transmission and distribution system cabling, as new sources of generation are connected and new technologies to reduce losses are adopted for flexibility.

8. Call for Evidence Question 8

What is the role of aggregators?

Summary

- 8.1 Most respondents agreed the main role of aggregators is to be a market facilitator, to aggregate energy efficiency projects by enabling economies of scale through grouping buildings or eligible parts of a broader refurbishment of energy efficiency projects into an investment portfolio. This also helps to bring the volume of flexibility from smaller, more diverse participants to the market, by reducing the administrative burden and risk of engaging. This together could provide a viable alternative to network reinforcement at sufficient scale.
- 8.2 Several respondents also noted connecting more devices and appliances to intelligent systems and smart controls could give a greater role to aggregators, as they are able to access a larger base of electric loads to provide demand response services. In turn ensuring that consumers have access to energy data and the ability to share this with service providers.
- 8.3 Several respondents also commented that aggregators should have an educational role in helping consumers identify opportunities and have the technical capability to physically connect the customers and integrate their load into their aggregate pool. Aggregators should invest in building expertise and contracts to install energy efficiency measures as current expertise lies with software and smart tech offers.

9. Call for Evidence Question 9

How should we best align with existing policies, particularly those referenced in section 2.4 of the Call for Evidence?

Summary

- 9.1 Most respondents agreed there is a need to streamline compliance to ensure policies work in conjunction with each other, and by developing existing policy to not add complexity to the existing landscape. In particular, reporting and compliance to be streamlined to facilitate a wider range of approaches based on effective use of available data. This could include a mandatory check as part of any new scheme that ensures all participants are compliant with and obtaining the full value of any benefits available through existing schemes.
- 9.2 Several respondents suggested the need to adopt a consistent measurement approach across all policies, empirical and based on metered time-series data to move away from estimated, modelled or deemed savings, possibly developing a UK version of CalTRACK. This was further explored by a few respondents that contested it would be beneficial to develop a system that incorporates already

existing policies which produces one set of results showing the “Asset, Occupational and Real” ratings of a property to produce a more accurate visual on how the building actually performs.

- 9.3 Other respondents referenced a range of further specific suggestions for existing policies, these included:
- The scope of the Energy Savings Opportunity Scheme (ESOS) to be extended to include Small to Medium Enterprises (SMEs) and implementation of the identified opportunities to be made mandatory, supported via the interest-free loans available through Salix Finance Ltd. It was also suggested that business should be incentivised to move to more energy efficiency installation through a cost-reflective carbon tax or higher penalties for non-compliance.
 - Tightening building standards for energy efficiency to drive the decarbonisation of heat. Further, stronger compliance and enforcement in regard to building regulations to align more closely with energy efficiency objectives, to install measures at initial construction rather than retrofitting.
 - Streamlined Energy and Carbon Reporting (SECR) to go beyond energy efficiency and include wider energy themes such as renewables, demand side response and data mapping to enable a more comprehensive energy strategy.
 - Climate Change Agreements (CCAs) to become more effective with access simplified and widened to more sectors with long-term future to be clearly signalled.
 - Advertising and Trading Standards to introduce a more stringent and technically competent policing operation to ensure information circulated about marketed products is accurate and clear to reduce misinformation.
 - Specifying a thicker cable in wiring regulations to reduce losses. This is most important for equipment which is in operation for a large proportion of the day – which would include most industrial equipment, and some building services equipment (heat pumps, chillers, ventilation).

10. Call for Evidence Question 10

Should we support behaviour change? If so, should it be supported in the same way as energy efficiency, which requires installation of measures?

Summary

- 10.1 Most respondents agreed that government should work, in conjunction with Ofgem and energy networks, to support behaviour change, giving customers greater choice and educating them on how to be more energy efficient in a way that meets their needs. Monetary value, convenience and trusted intermediaries will be key factors to changing consumer behaviour. This could in turn reach new vulnerable customer groups (e.g. customers with no access to digital apps or lacking flexibility of energy use) by continuing to seek ways to educate consumers about their options.
- 10.2 It was generally stipulated that in order to overcome scepticism and lack of awareness, there was a need to collect as many International Performance

Measurement and Verification Protocol (IPMVP) proven case studies on specific projects into one single evidence base to allow decision makers to recognise the significant contribution that behaviour change projects can make.

- 10.3 Several respondents suggested by assigning output incentives to DNOs to tackle social and environmental issues, such as avoided CO2 costs and tackling fuel poverty, that were 'valued' as part of this, then projects that were equivalent (in MW terms), but went further on fuel poverty (for example by deploying domestic energy efficiency measures) would be prioritised.
- 10.4 A few respondents argued the need for government to provide support and funding for the development of a best practice approach and methodology for delivering behaviour change programmes. This would include a standard behaviour change gap analysis approach, standard behaviour change business case approach and development of guidance notes. This could be further aided by supporting training and educational programmes for professional advisers to develop the industry's capacity for identifying and supporting behaviour change opportunities e.g. aimed at ESOS assessors who predominantly currently advise on technical measures.
- 10.5 Several respondents agreed that the continued smart meter roll-out would help customers better understand their energy usage and change their behaviour as a result.

Annex 1

Respondents Profile

Respondent Groups	Number
Trade Association	5
Environmental advocacy	2
Individual	3
Supermarket	1
Energy Manager	2
Energy and utilities consultants	4
Research and development	2
Distribution Network Operator (DNO)	4
Management consultancy	2
Electric utilities	2
Training consultant	2
Charity	2
Devolved government	1
Energy supplier	2
Transmission System Operator (TSO)	1
Power generator	1
Consumer advocacy	1
Total number of respondents	37

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