



# Energy Performance Certificates: Questions and Answers

# Energy Performance Certificates: Questions and Answers

**Elmhurst is receiving an increasing number of questions from homeowners, media and other industries about EPCs (energy performance certificates).**

**This document is designed to help answer those questions and support our members in providing answers that give homeowners a better understanding of EPCs.**

It provides:

- Top line information on what our views are at Elmhurst Energy on EPCs and the information they provide, our membership structure and quality assurance processes, and how we think EPCs should be reformed.
- Answers to the most frequently asked questions we receive from homeowners and other industries. This can be used by our members – energy efficiency professionals – to support you in your conversations as you deliver assessments.

## Elmhurst's 4 Key Points

- **We agree, EPCs need to change.** EPCs are not what people think they are, nor what they expect and want them to be. The EPC is no longer adequate in its current format as it simply shows the energy cost – i.e. how cheap or expensive a home might be to run, based on a standard occupancy model. Elmhurst has been calling for change for many years. We have been working with government since 2019 to get the well-documented EPC reforms implemented. It's important the general election on 4 July does not hamper progress and we will be pushing the new government to see this through
- **EPCs should tell homeowners about the 'Three Cs': energy cost, energy consumption, and carbon emissions.** These metrics will tell homeowners much more about their home. The EPC should also give information about possible energy efficiency measures, tips for reducing bills, and information about low carbon heating solutions. We have already designed an energy report to show how this could look.
- **Don't scrap energy assessments and certificates – that would be a disaster for the UK's efforts to reach Net Zero. Instead, make them much more useful and maybe call them something different.** There is huge value in the EPC data collected in the UK over the last 16 years. We must not lose that or stop collecting this data. We should 'relaunch' EPCs as a new, more user-friendly product, with robust processes and rules to ensure high quality.
- **The quality of our members and the energy certificates they produce are paramount.** In 2023, Elmhurst had a total of approx. 12,000 energy assessors registered, of which around 7,600 were domestic energy assessors (DEAs). DEAs lodged 919k EPCs and as a scheme, we received 453 complaints. We have a stringent auditing process in place which ensures that any errors and gaps in technical competence are addressed.

## EPCs and Customer Satisfaction

### Why do you think homeowners might feel unsatisfied with their EPC?

Energy assessors follow a national calculation methodology and agreed conventions. The assessment is non-invasive (i.e. no drilling into or removing materials), nor it is a housing condition or homebuyer/house survey. This means the data which is collected for the assessment is based on what an assessor can see and the evidence available to them on the day of the assessment.

In our experience, there are three main reasons why someone might be unsatisfied:

- First: some homeowners could understandably be unsatisfied with the depth of information provided in an EPC. They assume an EPC will be more comprehensive, more tailored to their specific household, and they want more practical advice from their EPC. Elmhurst agrees with this. We have long been calling for EPCs to become more than just an 'asset rating' based on broad and standardised assumptions about a property. Nobody really understands 'asset ratings' – we all want an energy survey that gives us bespoke advice, tips and insights about our home. We believe EPCs should cover the 'Three Cs': energy **consumption**, energy **cost** and **carbon** emissions. EPCs should also give people the information they want on potential low carbon heating solutions and ways to improve the fabric (walls, floors, roofs, windows, doors etc) of their home.
- Second: we recognise that some homeowners may not be satisfied with the level of service or expertise from the domestic energy assessor (DEA) who carried out the assessment. In these cases, we'd encourage you to approach the DEA and ask for more information and possibly a re-assessment. If the DEA does not respond, or what they produce is unsatisfactory, you should raise a complaint with the DEA's certification body. Elmhurst's customer service team can support homeowners with any questions relating to the service they receive, and we will act accordingly. We arbitrate between the complainant and the assessor to help resolve the issue.
- Third: of course, everything might be fine with the assessment itself, but homeowners might not be happy with the final EPC rating of the property, especially if it is band D or lower, because this indicates the fuel bills are likely to be considerably higher than those properties with band C or better. If it's very low, it also means they may not be able to rent out that property. This is often a source of annoyance for landlords, for example.

### What are Elmhurst's opinions on the EPC regime as a whole?

- The domestic EPC is still generally misunderstood. EPCs for homes were first introduced in England and Wales in 2007 as a cost metric, which means that the A to G rating simply indicates how cheap or expensive a home would be to run. The EPC is also based on standard occupancy and does not take account of how the property is used and the condition of the elements within scope of an energy assessment.

These facts alone are not widely known by homeowners, which is something that we have asked government to address where possible.

- However, things need to change. Elmhurst has advocated for many years that the EPC regime must change, giving equal prominence to **Cost, Carbon and Consumption**.
- We have spoken to Westminster and devolved governments about the problems with the current EPC and, to be fair, they have listened. In England, an EPC Reform consultation is set for this year. In Scotland, reforms are already well advanced. At Elmhurst, we're urging that July's General Election and any political change does not get in the way of vital progress around EPCs.

## Accuracy of EPCs

### My EPC looks inaccurate – can you explain why this might be?

- Some EPCs which appear to be inaccurate may boil down to common misunderstandings about the EPC, and the energy assessment process.
- The assessment process is non-invasive, and the data collected is based on what an assessor can see and the evidence available to them on the day of the assessment. If, for example, they were unable to access a part of a property, then they may enter 'no access' in that part of the assessment form. In this case the methodology would assume a default value when calculating the EPC.
- Moreover, EPCs for homes were first introduced in England and Wales in 2007 as a cost metric, which means that the A to G rating simply indicates how cheap or expensive a home would be to run. The EPC is also based on standard occupancy, and does not take account of how the property is used and the condition it is currently in.

### How can (and does) Elmhurst play a part in ensuring EPCs are accurate and understood by homeowners?

- Elmhurst has a reputation for training assessors to a good standard and we encourage all our members and other energy efficiency professionals to do more training to deepen their knowledge. We recently introduced our Better Buildings Consultant certification which encourages assessors to gain additional qualifications to enrich the advice and services they can provide.
- As an accreditation scheme we know how important it is for homeowners to receive a good service from energy assessors, which is why we regularly communicate to and encourage accredited members to have their own stringent complaints procedures in place which can support property owners and ensure any disputes are resolved promptly. We would encourage any homeowner concerned about the quality of the assessment to approach the assessor to remediate any issues, which they should do at no cost to the homeowner. If this issue is not resolved, you can also raise a complaint with the relevant certification body who will mediate for a resolution to the issue.

## EPC Recommendations

### Often, EPCs make identical recommendations. Why is this the case?

- This is to be expected. EPC calculation software automatically generates recommendations using the rules specified in the national calculation methodology, all of which are things that could improve the asset rating making it more energy efficient.
- It's common for EPCs to recommend similar improvements, as these are proven measures that will deliver the greatest EPC improvement and energy saving to a property with standard occupancy. These include cavity and solid wall insulation, loft insulation, floor insulation, smart controls, low carbon heating solutions such as heat pumps, solar PV and solar thermal. It is also common to see other measures such as LED light bulbs, hot water cylinder insulation and controls, and more.
- An EPC is working from a set of assumptions and a standardised occupancy model. In its current format, it can't take a household's specific circumstances into account.
- Unfortunately, some potentially helpful recommendations cannot currently be shown by the EPC. For example, it may make sense to recommend installing an air source heat pump or other electric heating system instead of replacing a gas boiler, because that will reduce carbon emissions. But because the EPC in its current format just looks at energy cost, and because the cost of electricity is currently higher than the cost of gas, the EPC will not typically display these as recommendations.

### Costs of energy efficiency measures on an EPC often carry a wide price range, such as recommendations for internal or external wall insulation at a cost of £4,000-£14,000. Is it possible to tailor costs more closely to house type and size?

- Some criticism of EPCs indeed focus on the indicative costs displayed next to each recommendation. The indicative costs are set by the national calculation methodology, they are not made up or calculated by the assessor. We do agree that sometimes these will appear to be just a guide and obviously can't reflect exact prices from local installers.
- We would always recommend a homeowner or stakeholder uses the recommendations to approach a range of installers for quotes for energy efficiency measures. This will take into account the type of dwelling and specific situation.

### Can you explain the general inability of EPCs to capture make/model of heat pumps, storage batteries, and other specific heating types and 'novel' tech (modern electric heating; infrared heating, thermal stores etc)?

- This is a limitation with the current EPC and current calculation methodologies: SAP for new homes, RdSAP for existing homes and SBEM for non-domestic buildings.
- Currently, the Appendix Q database has a list of approved technologies, such as low carbon heating solutions, that can be entered into the SAP calculation methodology. Appendix Q and the process for including new technologies is currently being consulted on by DESNZ as part of the 'New SAP' – the Home Energy Model (HEM).

- Elmhurst supports this as a way to develop an improved process that can include new low carbon technologies in a speedier, more pragmatic, agile way.

## Training and Certification of Assessors

### What are Elmhurst's criteria for registration as a member?

- To become an Elmhurst accredited member, in the case of a domestic energy assessor (DEA), they either need to have qualified through our DEA courses or provide evidence of qualification via another training provider. The first EPC by any new accredited member is always audited by Elmhurst.
- Elmhurst's ABBE Level 3 Domestic Energy Assessor training is available as both an online and classroom-based course. All trainees must also undertake onsite assessments and test questions in order to complete their professional portfolio, which is required for qualification. On average, the process to become fully qualified with Elmhurst can take up to 4-6 weeks.
- Elmhurst has championed the need for quality training with robust standards. As part of the EPC reform it would be essential to include standards for all energy assessor training throughout the UK.

## Complaints and Customer Service

### How do customers complain?

- As an accreditation scheme we know how important it is for homeowners to receive a good service from energy assessors, which is why we regularly communicate to and encourage accredited members to have their own stringent complaints procedures in place which can support property owners and ensure any disputes are resolved promptly.
- We do encourage any homeowner concerned about the quality of the assessment to approach the assessor to remediate any issues, which they should do at no cost to the homeowner. You can also raise a complaint with the relevant certification body, who will arbitrate to help resolve the complaint
- The process of raising a complaint is simple, certainly for Elmhurst we have an online system, which we have recently updated to help educate and inform consumers on what EPC are and importantly what they are not. With an aim to resolve complaints in a timely manner.

## Audits

### What is Elmhurst's auditing process?

- The rules on the frequency of audit are listed in the EASOB Scheme Operating Requirements (SOR). Audit regimes slightly differ, depending on whether assessors are based in England and Wales, Scotland or Northern Ireland. But broadly speaking the rules are the same.

- The SOR for England and Wales last changed in 2018. It has two levels: level 1 can be updated by DLUHC and level 2 is controlled at an industry level by the EASOB Group, which the certification schemes can input into. The EASOB group meets three times a year to revisit processes and make necessary amendments, which are put to government to approve.
- Elmhurst has a very active auditing programme. We expect to carry out more than 40,000 audits this year, each taking around 20-25 minutes. In total, we expect to spend up to 17,000 hours (more than 2,200 working days) on auditing this year.
- Audits are generally split between four types: new user audits, follow-on audits, periodic random audits, risk-based audits (also known as 'smart audits').
  - New user audits happen automatically when a new accredited member lodges their first EPC with Elmhurst. If they pass that, they move onto periodic random audits. If they fail the new user audit, they will receive feedback and after that, a follow-on audit.
  - Follow-on audits are just that – a second, follow-on from a previously failed audit.
  - Periodic random audits are just that, they are random audits of EPC lodged by assessors across the year.
  - Risk-based audits ('smart audits') are triggered by a number of issues such as a previous audit failure, producing an EPC incorrectly, or if more than one EPC lodgement is issued for a single property in a period of three months. Schemes regularly review criteria for calling smart audits, and we do over time see some issues appear much less, which shows the process works. For us, it's an iterative process to ensure assessors are carrying out EPC assessments correctly and that we're spotting repeat issues and using the smart audit process to correct those knowledge gaps. If an assessor fails a smart audit, they have a follow-on audit within six months. In the case of three successive fails, the assessor is automatically struck off.

### What happens during an audit?

- Elmhurst looks at the assessor's model produced when they assessed the property. We look at their inputs against the evidence they provide for the audit and recalculate it to see if they match. If they do not match within the industry agreed tolerances, the audit is classed as a fail and depending on where the assessor is in our audit process, they will be called for a follow-on audit or issued with corrective action. Crucially, where an EPC is deemed to be 'defective' through the audit process, Elmhurst ensures it is removed from the EPC register and replaced with a correct EPC.
- A defective EPC can be for many reasons. It may be that the right calculations were given, but there are small description errors on the physical document, or the certificate might fall outside of the acceptable tolerance, among others.

### Do you consider the audit regime to be acceptable?

- Yes and no. We find that our auditing regime within Elmhurst is pretty good at spotting and correcting issues. It also focusses on high risk assessments in an effort to improve

the quality of EPCs. As an industry we also believe that we audit more than any other professional body that we know of.

- The audit regime is only one part of Quality Assurance. It is equally important that Elmhurst (and others) provide CPD, Training, Bulletins etc to update professional competence.
- Elmhurst also supports our accredited members with a helpline, ensuring their technical queries are answered by trained and experienced professionals.
- We give members intuitive software, which helps capture correct information on site.

### Is the 2% audit requirement under the SOR sufficient?

- We believe so. The Scheme Operating Requirements call for us to audit 2% of all EPCs but the reality is Elmhurst audits more than that.
- The rules of auditing use smart logic to use the data to look for potential high risk EPCs. Of course, any system can be improved, but the system needs to be smart and should never be just a volume game.

### What is being done to reduce the number of defective certificates?

- Elmhurst continually promotes ongoing CPD and additional training, with regular technical bulletins distributed. We also provide members with software which attempts to help them gather the correct data and evidence on site. It will also flag where unusual data items have been input. All of this in an effort to reduce any potential errors.

## Suspension and Striking Off

### What is 'corrective action' and when is it used?

- Elmhurst's audit process requires corrective action if an assessor fails a follow-on audit. This may involve the assessor doing more technical reading, research or training to increase their knowledge and skills. Whatever they are required to do is specifically designed to address the areas of failure within the audit.

### In what cases might you suspend an assessor?

- When corrective action is proposed, an assessor is automatically suspended until they can provide proof they have completed that action. They cannot do assessments or lodge EPCs with Elmhurst or any other certification scheme while suspended.
- Other circumstances include:
  - If, when an assessor is called for audit, they don't provide evidence within three weeks they are also suspended from practising until they do.



- Assessors can also be suspended for not providing the annual CPD required, and this suspension will continue until they do.
- Any suspended assessor is notified to the Central Register which is run by government. This should notify any other certification schemes that the assessor is suspended and should not be continuing to practice. (The only exception to this rule is if they are suspended by another certification scheme for not providing their insurance. Elmhurst provides insurance for all members so they could continue to practice under us.)

#### What happens if an assessor is repeatedly suspended?

- Repeat corrective action (and therefore suspension) is likely to mean that an assessor's case gets raised with Elmhurst's Independent Certification Committee, a group of people who haven't had any involvement with the audit process prior to this point. The committee would reach a decision about whether the assessor should be suspended or indeed have their membership revoked (struck off).
- If they are struck off, this gets notified to the Central Register (and therefore all certification schemes) and they can no longer practice as a DEA.
- Members who are struck off can appeal the decision to Elmhurst's Independent 3<sup>rd</sup> Party Oversight board.

#### Can people work with other certification schemes once suspended?

- No. Any suspended assessor is notified to the Central Register which is run by government. This should notify any other certification schemes that the assessor is suspended and should not be continuing to practice.

#### Can people work with other certification schemes once struck off?

- No. As a general rule, when DEAs are struck off, they are not allowed to practice under any other certification scheme. In some rare cases, sometime later someone might apply for membership to another scheme. That scheme then takes a view and hears their case from both the applicant and the previous certification scheme, deciding whether they wish to accredit with them.

#### How many assessors has Elmhurst struck off in the last year?

- In 2023 Elmhurst revoked the membership of 4 energy assessors

## Future of EPCs

#### Who set up the EPC regime?

- The Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007 came into effect on 1 August 2007 as part of a phased approach. The first stage required the production of energy performance certificates for homes when sold (marketed sales only), moving to all buildings when built, sold, or newly rented by 2008.

- The domestic EPC was introduced as a cost-based metric. The A to G rating simply shows how cheap or expensive a home might be to run, based on a standard occupancy model. But nothing more.
- Elmhurst has been calling for changes to the EPC since 2019. Reform has been on the cards since a call for evidence on EPCs in 2018, followed by the government's EPC Action Plan in 2020.
- In England and Wales, the Government Department for Levelling Up Housing and Communities (DLUHC) has indicated the EPC Reform consultation will come out this year, and the Department for Energy Security and Net Zero (DESNZ) has indicated its 'EPC Wrapper' consultation will also arrive in 2024/25 as the results of the Home Energy Model (HEM) – the new methodology to replace SAP – a consultation should be out in 2024.

**As the UK's leading EPC assessment training/registration organisation, what do you think needs to be done?**

- Despite the current fuel price crisis, government and public interest now goes far further than just cost. Elmhurst would like to see a more comprehensive and informative EPC, rather like food nutrition labelling. An EPC should show the 'Three Cs': energy consumption, energy cost, and carbon emissions. These are the things everyone now cares about.
- Fortunately, the national calculation methodologies – SAP for new homes, RdSAP for existing homes and SBEM for non-domestic buildings, plus the Home Energy Model (HEM) which has recently been consulted on to replace SAP – have the capability to present all three metrics. All three should be illustrated in the EPC. Every environmental policy and regulatory campaign can then align to one or more of those metrics, and we can measure progress more easily.
- In the meantime, RdSAP 10 is set to change this summer to include more detail – assessors will have to measure more things when they visit a home, which should help provide more inputs into the calculation software and make an EPC a bit more accurate. All of Elmhurst's assessors using RdSAP will be fully prepared to use the new software when it is ready.
- An EPC is typically valid for 10 years and many are very out of date. Elmhurst believes the EPC should be re-assessed and re-issued whenever there is a change to a building that impacts its energy performance. Any EPC should never be older than three years to maintain the relevance of estimates and recommendations.
- The perfect energy survey should give homeowners and others the following:
  - The asset rating: the predicted energy cost and consumption of the building, based upon nominal or average occupancy patterns. (This is the bit covered by an EPC at the moment).
  - An occupancy rating: the true predicted energy consumption of the building, based on the people using it.
  - Energy consumption: what energy the building actually uses to run, ideally based on data from smart meters, which can also give reliable information on carbon emissions.

- Detailed, bespoke information about possible energy efficiency measures, tips for reducing bills, and information about low carbon heating solutions.
- We have already designed an energy report to show how this could all look.

### Shouldn't the whole EPC system be scrapped?

- No. Having about 16 years of asset rating data about our housing stock is hugely valuable and we shouldn't stop collecting that information. Having even a basic EPC regime in place is better than making no attempt to measure building energy performance. Leaving the UK without a framework would be disastrous in our roadmap to Net Zero 2050.
- That said, it's clear that public expectations of energy assessments are much higher than the current EPC regime can deliver. They need adding to, rather than scrapping altogether. Maybe give them a new name too. This has been recognised for many years – we hope the new government will see through the well-documented plans for EPC reform.
- We strongly support this vital industry. The importance of the EPC has significantly increased, and we welcome the updated methodologies. The reform of the EPC is urgently needed to clarify many issues raised by consumers.
- We are committed to helping consumers understand their homes and buildings and provide information on what to do next to make them more energy efficient. It is essential that we measure homes correctly and accurately, empowering consumers with the confidence to take the next steps in reducing energy usage and carbon emissions, lowering bills, and living in warmer, healthier homes.

## Energy Performance Certificates: Questions and Answers

---

**Elmhurst Energy**  
16 St Johns Business Park,  
Lutterworth, Leicestershire, LE17 4HB  
01455 883 236



elmhurst  
energy

EXCELLENCE  
IN ENERGY  
ASSESSMENT