

Rt Hon Jacob Rees-Mogg MP  
Secretary of State for the Department of  
Business, Enterprise and Industrial Strategy  
1 Victoria Street, London SW1H 0ET

17th October 2022

Dear Sir

I write to alert you to the fact that household energy performance certificates (EPCs) are currently causing fuel poverty for many residents of Britain's older housing stock. This is because EPC calculations do not work correctly for traditional homes built before 1925.

**1+20 = Fuel poverty**   
We need the numbers in the current EPC calculations corrected



**BEIS, DLUHC and BRE need to act now to correct the numbers**

Cont.

### **EPCs causing fuel poverty**

EPCs currently award just 1 point for installing draught proofing in a typical, 3-bed traditionally built home, when this is the single most cost-effective action to cut heating bills. In contrast EPCs award 20+ points for installing high heat retention storage heaters (HHRSH) when these save little energy and have been found to significantly increase heating costs. The result of these two calculation errors is that, in order to comply with the legally binding Minimum Energy Efficiency Standards (MEES), landlords are motivated to install HHRSH instead of draught proofing and this is plunging inhabitants into fuel poverty. There have been cases of heating bills rising to as much as £500 per month, causing tenants to get into debt and be referred to social services.

A third major calculation error in the EPCs is the ratio of energy efficiency to EPC points. This should be a linear relationship but is currently a logarithmic relationship, causing many traditional properties to be given an EPC rating which is 1 or 2 grades below what it should be.

### **Act now before 2nd November**

The Building Research Establishment say that these problems are being addressed, but there is a question over whether they will be fixed in the 2023 version of EPCs or in a few years' time. We need to ensure the errors are fixed now to prevent major mis-investment by landlords. The final EPC advisory group meeting is on 2<sup>nd</sup> November, the last clear opportunity to change this version of EPCs. If the errors are fixed, EPCs will be a powerful tool to retrofit Britain's old housing stock, which causes 20% of the nations' carbon footprint. If the problems are not fixed EPCs will remain unfit for purpose because they reward landlords for installing heating systems that plunge tenants into fuel poverty, and stop properties being prepared for net zero.

I write to inform you of this significant threat to the UK's retrofit plans. Please find attached the infographic which illustrates the problem in simple terms, in case this is useful to circulate. On behalf of the EPC Project and its supporting estates and retrofit experts, and the UK's owners of traditional and listed properties, I ask you to take swift action to ensure that the problem is solved before it is too late.

Yours sincerely,

Mukti k. Mitchell

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EPC Project <https://carbonsavvy.uk/epcstudy/>  
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cc. Rt Hon Jacob Rees-Mogg MP, Secretary of State for Business, Energy and Industrial Strategy (BEIS); Rt Hon Simon Clarke MP, Secretary of State for the Department of Levelling Up, Housing and Communities, (DLUHC); Sir Geoffrey Cox MP; Gillian Charlesworth, CEO, BRE; Phil Wilbraham, Chairman, BRE; John Henderson, BRE; Hon. John Rous, Clovelly Estate Company; Jonathan Thompson, CLA; Morwenna Slade, Historic England; Moses Jenkins, Historic Scotland; Jill Fairweather, CADW; Jo Lugg, National Trust; Marian Wood, SPAB; Nigel Griffiths, STBA, Peter Rickaby, The Retrofit Academy; Russell Smith, Parity Projects; Peter Warm, WARM Ltd; Paul Dickinson, CDP (formerly Carbon Disclosure Project); National Media.