



First of all we would like to ask you to read the following article which explains our position in detail and provides a case study demonstrating the benefits of the existing DEC framework and in particular the central database of annual public building energy consumptions which it has generated: <http://transitionbath.org/transition-bath-concerned-dclgs-attempts-abolish-decs-schools/>

Q1: How could the existing enforcement regime be improved?
To date we have not seen any significant issues with the availability of DEC's for public buildings and in particular schools, so enforcement has not been necessary in our region. The only minor issue we have seen is when a school below the 500 m ² (or historically the 1000 m ²), extends the floor area of the building over the limits and forgets its new obligation to provide a DEC. This however is a minor inconvenience. In regions of the country where DEC's are not in routine use, we would recommend a publicity campaign to explain their cost-saving benefits and engage the public.
Q2: How may barriers to enforcement be overcome?
We don't see enforcement as a significant issue.
Q3: Who should be the enforcement body for the display of DEC's in public buildings and why?
We have no view on this, and believe the existing framework is adequate. Community groups (such as ours) should be allowed and encouraged to scrutinise the DEC data for public buildings in their area, without having to purchase the data from Landmark.
Q4: Should the existing system for DEC's remain unaltered?
Yes, largely. A minor reduction in costs, and simplicity could be achieved by moving from a per building DEC to a site wide DEC if the current lower granularity reporting requirements are proving a burden to an organisation e.g. where buildings are not individually metered on multi-building sites.
Q5: Should exemptions from the requirements of DEC's be applied to qualifying buildings?
Absolutely not. We feel this consultation is a triumph of nonsensical political dogma over rational economic thinking. The argument for exemption from an asset rating for historical buildings and places of worship is the perceived difficulty of improving their fabric without affecting their appearance/authenticity. It actually makes sense to deploy a DEC, but not an EPC, for these categories of building. That presumably is why they were not exempted from DEC's in the first place?
Q6: Should those buildings that have and display EPC's be exempt from the requirements of DEC's?
No, they are different things. There is potential for the advisory report to be replaced by the EPC recommendations report, but the annual energy consumption reporting is essential for tracking, managing and improving the performance of individual public buildings.
Q7: Should an energy certificate be required when 500m ² is occupied by public authorities and frequently visited by the public?
THIS QUESTION IS PHRASED IN A HIGHLY DECEITFUL WAY. We challenge how the consultation suggests redefining a building that is "frequently visited by the public" as one having an area of at least 500 m ² which the public "enter on a daily basis, or, for example, it is also used as a community centre in the evenings". Is the public has to have access to at least 500 m ² of the building if the building is to be considered visited by the public. We also do NOT believe that this would give "greater certainty" about which building was exempted and which not. It would require a farcical and very expensive level of floor area measurement and visitor auditing of many public buildings, which would be more expensive than doing the DEC for that building annually for the next 10 years.



Q8: Should the validity period of DECs and their accompanying recommendation reports be 5 years?

No, the current regime should be maintained, annual reporting of energy consumption with 7/10 year advisory/EPC reports as per the current regulations.

Q9: Should the validity period of DECs and their accompanying recommendation reports be 10 years?

No, see our answer to Q8.

Q10: Should the DEC regime be altered in the way outlined above?

Absolutely not.

Q11: Should the mandatory DEC regime be abolished?

Absolutely not.

Q12: If mandatory DECs were abolished would you still obtain one?

Yes, given we use them to work with third parties, but we are hoping this will not happen.

Q13: Which proposal is your preferred outcome?

We would like the status quo maintained as we feel DEC certificates and in particular the reporting of annual gas, electricity and oil consumptions into a central database is an invaluable tool to improving the energy performance of public buildings.

If there is to be a review, we feel that it should focus on how to automate the use of smart meters (Automatic Meter Readers) to provide the annual energy reporting without the need for user involvement. Ideally we would like from this to see more granular reporting, which could identify schools with excessive out of hour's usage. A brief write-up of our use of AMR data to analyse and reduce schools gas consumption is available here: <http://transitionbath.org/18-reduction-gas-consumption-bnes-schools-since-last-year/>. We also have a more detailed report of some 90 pages available which covers the analysis of both gas and electricity AMR meter data for 72 schools in Bath available on request (schoolsenergy@transitionabath.org). We would like this consultation to be based on rational economic evidence not political dogma.

To reiterate we have outlined our justification for maintaining the status quo, using an example of the benefits of the existing DEC regime in this article on our website:

<http://transitionbath.org/transition-bath-concerned-dclgs-attempts-abolish-decs-schools/>