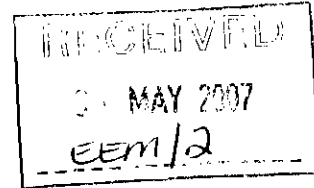




The Forum of Scottish Local Authority
Energy Officers



Energy Efficiency and Microgeneration Strategy
Energy Efficiency Unit
Scottish Executive
Enterprise Transport and Lifelong Learning Dept
2nd Floor Meridian Court
5 Cadogan Street
Glasgow
G2 6AT

Dears Sir

Energy Efficiency & Microgeneration Strategy

The Scottish Energy Officers Network welcomes the draft publication by the Scottish Executive of the above strategy and the opportunity to respond to this consultation.

In order to formulate the council's response, the strategy has been circulated to relevant officers throughout the SEON membership, and their views and comments collated in order to formulate the attached response.

In summary, SEON welcomes the leadership shown by the Scottish Executive in the production of the strategy. We would also support the proposed subsequent action plan, which we believe will allow all Scottish local authorities to continue moving forward in this important area of work.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Ron Hill'.

Ron Hill
(Chairman)

Ron Hill (Chairman) North Lanarkshire Council
Housing and Property Services Department Energy Unit
Fleming House Cumbernauld G67 1JW
Tel 01236 616347 Fax 01236 616343 E-Mail hillr@northlan.gov.uk

**Response by the Scottish Energy Officers Network
to the Scottish Executive
Energy Efficiency & Microgeneration Strategy**

The Scottish Energy Officers Network (SEON) represents the Energy Officers of all 32 Scottish Local Authorities.

The following responses were collated following circulation of the draft strategy to the energy officers and replies are listed in response to the corresponding numbered sections within the report.

12. We would welcome the aims of a “one stop shop” approach and also the other points in this section. However, we would suggest that for these aims to succeed then the whole process requires to be marketed in a better way. For example, few organisations recognise that organisations such as the Carbon Trust and EST are wholly funded by the Scottish Executive and therefore do not provide an appropriate response if at all. We suggest that the Scottish Executive directly “badge” these initiatives to ensure a greater response from the public sector particularly in reporting. SEON members feel that senior management within the public sector, who may have different priorities, do not know who EST and Carbon Trust are, but will on the other hand always respond to the Scottish Executive. Any action in this area would it is felt benefit the energy officers and lead to better progress being made.

17. While we recognise and support the success of SCHRI we would point out that from SEON members viewpoint, SCHRI and the number of other initiatives of this type are cumbersome in the application process and time consuming to complete the funding process, with no guarantee of success. This is exacerbated by the funding being administered by a number of different bodies. This may be resolved by the adoption of the one stop shop approach suggested in 1.2.

19. –20. Members recognise and support the success in improving domestic energy efficiency and welcome the proposal to set further targets. We would suggest that this success is in part due to the reporting mechanisms employed. We would suggest similar reporting mechanisms are employed in this current strategy and any ensuing action plan.

1.31 The Renewable Heat Strategy being separately developed by the Executive would be better incorporated into this strategy and included in the proposed action plan.

5.25 It would be simpler and more effective to reduce the qualification level for ROC’s to a level where individual households could be eligible.

5.29 The energy performance certificates issued under the EUEPBD simply require public sector organisations to display the certificate for public scrutiny in properties over 1000 M2. The directive has no mandate to compel or encourage organisations to improve the building performance. It is felt that being open to public scrutiny is not enough. This strategy, through the action plan, should require organisations to report to the Executive what action has been taken to set more ambitious goals for improvement, and what progress has been made to achieve them. A support toolkit could be developed if required.

7.3-7.7 While we recognise and support the ambitious goals set out under CEEF, we believe that much of the achievement to date is the result of the necessity under CEEF guidelines to report progress to the Scottish Executive. We would encourage the Scottish Executive to include targets and reporting mechanisms into any action plan in support of this strategy. This would encourage the public sector to lead by example and also provide accurate data for future monitoring purposes by the executive.

7.15 SEON members welcome the commitment by the Scottish Executive to work with local authorities and other partners to develop ways in which councils can monitor, report and benchmark emissions etc. We believe this work should be undertaken as quickly as possible as this vital exercise will, for the first time, produce reliable and accurate data to form the basis for monitoring and targeting reduction for years to come.

7.26 We look forward to the Executive publishing its intentions in this important area.

7.27 While we broadly agree with the conclusions of the Mc Lelland report, we would point out that in the very important area of energy procurement, great care has to be taken in how this is achieved through collaboration. It is our experience that:-

- 1) Best prices are achieved, **not** through the volume purchased, but through the accuracy of energy consumption data being provided to potential suppliers by participating councils. While a few councils strive to maintain accurate data, we feel that s, could be disadvantaged through inaccurate or insufficient data being held by other participating councils/organisations resulting in poorer prices offered by suppliers.
- 2) Experience by some councils of energy purchase via an existing consortium is that, in a market of unstable prices, some suppliers are reluctant to bid for high volume energy supply because of the risk factor involved resulting from inaccurate data, as noted above, and also the diverse nature of these contracts.
- 3) Some Council have demonstrated to their own satisfaction, that because of the above and other reasons, we could achieve better energy prices through tendering energy supply as a single council with sound data, than we have in the past as part of a consortium.

While the technicalities of energy procurement are too numerous to be dealt with in this response. We note it is the Executive's intention to establish a team in April 2007, to take forward the Mc Lelland recommendations. We would strongly suggest that further discussion take place before decisions are made in respect of large volume energy procurement, and discussions should involve the energy officers for technical input as general procurement officers do not have the required expertise.