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Consultation Response

Which? response to the Department for Energy Security and Net Zero consultation on The Home Energy Model: Energy Performance Certificates

Submission date: 18/03/2026

Summary

We welcome the government's plans to reform EPCs. EPCs have the potential to be a valuable tool for consumers wanting to understand the energy efficiency of their home or a property for sale or rent, and a gateway for understanding the improvements consumers can make to their home. They also have an important role in demonstrating compliance with minimum energy efficiency standards for rented homes and eligibility for some forms of finance. These issues are particularly important in the context of the government's Warm Homes Plan and ongoing concerns about energy bills.

Our research has highlighted serious issues with EPCs in their current form with limited consumer engagement with EPCs, poor understanding of the current metric, and recommendations that are not seen as relevant or useful. Our investigations have also highlighted serious issues with the accuracy and reliability of EPC assessments which we expect the government to address in future reforms.[1] The government's decision to maintain the 10 year validity period for EPCs will also undermine accuracy as data will inevitably become out of date in that period.

Most consumers will not engage with the detailed points relating to the Home Energy Model, but it is important that the metrics accurately reflect relevant aspects of the property and its heating and hot water system, and can easily be explained to consumers. Where consumers do want to engage with the detailed data behind the ratings this should also be supported.

[1] We conducted a second investigation in 2026 that revealed similar concerns with the accuracy of EPC assessments Why you can't trust home energy assessments, Which? Magazine, March 2026.

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In some areas we are concerned that decisions may be based on limited evidence as to how consumers will understand and act on the information that is given. We encourage the government to do further consumer testing of these proposals including alternatives to ensure that the metrics provide consumers with accessible and relevant information.

Given the increasing complexity of the information presented in an EPC, there is a risk of information overload. Based on the research we conducted with consumers we recommend that EPCs have a dashboard at the top of the EPC with the four metrics to provide consumers with a 'snap shot' overview of the property. The metrics, ratings and recommendations can then be unpacked and explained in more detail in the remainder of the EPC.

In relation to the presentation of the metrics our research found that consumers were familiar with the A-G rating and appreciated the associated numerical score in order to understand how close or far the property was from achieving the next grade. All the metrics proposed in this consultation are based on an aggregate score made up of scores relating to more than one factor. To support consumer understanding each of these factors should be clearly set out in the EPC and the relative performance of each should be clearly explained.

Full response

Modular approach

Question 1: Do you agree with the introduction of a modular approach to data input for existing builds, where assessors can enter complete data where available and rely on defaults for other elements? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any comments or evidence to support your answer.

We agree with the proposal, with the proviso that the use of actual performance data should only be allowed where there are agreed and verifiable methods for collecting and recording that type of data. Where actual performance data is used it should also be clearly identified in the EPC.

Question 2: Please share your views on the following potential impacts of a modular approach.
a. Quality of assessments and EPCs:

- **assessment accuracy**
- **trust, usability, or consistency in EPCs**
- **how inputs are communicated to consumers/householders**

b. Impact on assessors' workloads, costs, training, and skills?

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c. Implementation risks, for example: QA/audit and fraud risk, supply-chain readiness and training needs
d. Anything else you feel is relevant.

The flexibility to include actual performance data where there are agreed and verifiable methods, should ultimately contribute to more accurate EPCs and improve trust in EPCs. The ability to include options for inputting further data in the future will also help to ensure that EPC accuracy can be improved over time. As these methods become more widespread it would undermine trust if this more accurate data is available that is not reflected in EPCs.

All assessors will need to receive additional training to understand when and how additional data can be used. We assume that agreed sources of data will be added gradually, as it will take time to agree standards for the collection and recording of each type of data. This will hopefully reduce the initial burden on assessors but updates will need to be included in the ongoing training which is already part of the accreditation of assessors.

We do have some concerns that this could further increase the risk of a two tier system where diligent assessors collect this data and deliver more accurate assessments. The ability to enter additional data could also increase the risk of fraud, for example where an assessor ignores additional data that is likely to result in a lower rating than if they used the default data.

To manage these risks there should be agreed standards for verifying data**.** This information must be available to auditors but should also be available to consumers so that those consumers who are willing and able to, can engage with the details of their EPC. This will enable them to get a better understanding of the evidence that has been used and reassurance that any equipment used in the assessment or documentary or photographic evidence that they provided to the assessor has been used. When we requested data for EPCs that were completed as part of our research, we were unable to get it from the accreditation schemes.

This more detailed information should be presented separately from the EPC to avoid information overload. For example the information could be included as part of a Building Passport that is available through a link in the EPC.

The government should also continue to revise the default data to ensure it accurately reflects the characteristics of homes in the UK.

Question 3: Please share your views or provide any evidence on any alternative approaches you think we should consider for existing dwellings.

No response.

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Question 4: If a modular approach is adopted, the term "Reduced data HEM" (RdHEM) may not accurately reflect the model's structure or purpose. We want to ensure the terminology clearly conveys this flexibility and avoids confusion with previous approaches. A clear, intuitive name will help stakeholders understand the purpose of the methodology and distinguish it from both full HEM and legacy RdSAP. Potential options for the new name are:

- **HEM for Existing Dwellings (HEMEX) • HEM Input Expansion (HEMIE)**
- **Mixed Data for HEM (MdHEM), or**
- **Reduced data HEM (RdHEM).**

Do you have any views on the proposed alternative name(s) that would better capture the intent and flexibility of a modular version of HEM? Do you have any other suggested options that are not listed above?

Our assumption is that this is a question for professionals working in this sector and that most consumers won't engage with this level of detail. However our view is that HEM for Existing Dwellings (HEMEX) is the easiest to understand.

Fabric performance metric

Question 5: Do you agree with the proposal to evaluate fabric performance using FEE? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any additional comments or evidence to support your answer.

We agree with the proposal for evaluating fabric performance.

Question 6: Do you agree with the approach to maintain broad equivalence between the C/D boundary in the current EER rating and the C/D boundary in the Fabric Performance Metric? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any additional comments or evidence to support your answer, including evidence on the sorts of measures that should be prioritised under this metric.

Generally we agree with maintaining broad equivalence with current boundaries to support comparison and that the current A-G rating covers the range of homes in the UK and there hasn't been significant improvements in energy efficiency which would justify a regrading to incentivise continued improvement.

We agree with the National Retrofit Hub that the 'C' rating should be set at a high enough level to ensure fabric is upgraded to provide thermal comfort, affordable warmth, and ensure efficient

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heating system operation. Our research suggested that consumers generally see a ‘C’ rating as ‘good enough’; based on this, they are likely to assume that a property that has a ‘C’ rating is reasonably warm and comfortable to live in.

We support the proposal that the rating recognises the impact that hot and cold weather can have on comfort, assuming that suitable methodologies are available to assess both aspects. A highly rated property should be able to perform well in both warm and cold conditions.

Question 7: Do you agree with the Government’s proposal to introduce an option for recording Heat Transfer Coefficients based on SMETER measurements, as supplementary information about fabric performance? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any comments or evidence to support your answer.

We strongly agree with the use of data from SMETERs where there are agreed standards for verifiable collection and recording of the data. This will increase accuracy by recording the actual performance of measures rather than the assumed performance. The ability to use SMETERs for EPC assessments will also encourage wider use of the technology which will ultimately help consumers to assess the quality of installed measures and hold installers to account for their work. We encourage the government to also look for other opportunities to support the wider use of SMETERs

Question 8: Do you have any views on how the provision of additional information, such as that derived from SMETERs, should be enabled within the energy assessment process in practice? Please provide any evidence to support your answer.

As noted in our response to questions 2 and 3, the ability to enter data other than defaults could increase the risk of fraud, therefore it is important that any data from SMETERS that is used in an EPC must use agreed standards for verifiable collection and recording of the data.

Heating metric

Question 9: Do you agree with our proposal on the design and methodology for the Heating System metric? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any additional comments or evidence to support your answer.

Question 10: Do you agree with the proposal to set the C/D boundary such that direct electric will always score a D or below, and that storage-based technologies would score above or below the C/D boundary based on their emissions relative to direct electric. Response options: strongly agree, agree, neither agree nor disagree, disagree or

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strongly disagree. Please provide any additional comments or evidence to support your answer.

We neither agree or disagree with the proposals set out in questions 9 and 10.

We agree that an assessment of the efficiency and carbon emissions of the heating and hot water system will inform consumers about important aspects of their heating system and establishes a clear rationale for the metric. We also agree in principle with the aims set out in the consultation as to where different heating systems should ideally land in the rating system.

However:

- we are unclear how the rating can be based on an objective calculation of efficiency and carbon intensity at the same time as predicting where different heating systems will fall in the ratings. Ultimately the efficiency and carbon emissions should determine the rating but we agree that the relative weighting of carbon intensity and efficiency should, as far as possible, reflect the outcomes set out in the consultation.
- as private sector landlords have the option of choosing either the heating system metric or the smart metric as their secondary metric, the rating must be tested to ensure it doesn't incentivise landlords to install heating that is cheap to install but more expensive to run. This is likely to include both direct electric heating and storage heating.

  For example, there may be circumstances in which, despite the relative inefficiency of direct electric heating, a homeowner may consider it a good option. In these circumstances the heating metric will record a low rating, however there is an incentive for a homeowner to improve the property's overall energy efficiency through other measures such as fabric improvements, solar panels and batteries and these improvements will be recognised in those metrics as well as contributing to a higher energy cost rating. Unfortunately this won't work in the Private Rental Sector as the only metrics used to determine MEES are the fabric metric and the heating or smart metric.

We also support the ability of the Home Energy Model to include actual performance data from heating systems rather than modelled data for the same reasons as set out in answer to question 2.

Question 11: What is your view on the option of reserving the highest scores of A/B for electric cooking appliances?
Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Do you have any views on how these should be reflected in EPCs (whether in terms of banding or advice to consumers?)

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Neither agree nor disagree. We recommend that the government undertake more consumer testing to understand how consumers will understand this proposal and explore the potential to use other approaches to inform consumers about the benefits of switching to electric cooking.

We suspect that most consumers will not expect to see cooking included in a heating metric and there is a risk that including too many elements in one aggregate rating makes it less likely that consumers will understand the metric and the practical implications for them and the property.

Understanding the impact of a gas cooker or hob is also increasingly difficult in households that have a range of cooking options including microwaves and air fryers. However we do agree that the choice of electric or gas cooking can be important from a health perspective and, for households that have electrified heating, moving to electric cooking will mean they no longer need to pay the gas standing charge. Ultimately this will also be necessary for the decommissioning of the gas grid. It may be more effective to inform consumers of these risks and benefits through other avenues such as product standards.

If cooking is included it should be given a score in relation to its relative impact which would be applied to a numeric scale which would be the basis for the A-G rating. This feels more logical than not allowing the top two ratings for properties that don't have electric cooking.

Smart readiness metric

Question 12: Do you have any views on the proposed list of technologies that would be recognised under the Smart Readiness Metric and their relative scoring? Please provide any evidence to support your answer.

We agree that smart meters should be included but given concerns about the number of smart meters that are installed but not in working order, the assessment should be based on smart meters that are capable of working consistently with a time of use tariff.

The government should provide more details about how it will assess smart equipment that can easily be moved from the property. This is likely to increase over time with plug in batteries and solar panels already available.

Question 13: Do you have views on the options we have set out for how to achieve a C on the Smart Readiness Metric?

We recommend that batteries are required in order to achieve a C rating as they are critical to achieving the 'flexibility and demand reduction' aims that the government has set out for this metric.

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Given the potential for private landlords to use the smart metric as their secondary metric the technologies should be sufficient to achieve a significant reduction in the household's energy bills.

Question 14: Do you have any evidence to provide on what an appropriately sized solar array should be to reach a C?

No response

Question 15: Do you have any evidence to provide on what an appropriately sized electric battery should be to reach a C?

No response

Question 16: Do you agree that a bidirectional EV charge point should be recognised as an alternative to other forms of energy storage, such as batteries, in order to achieve a C on the Smart Readiness Metric? Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any additional comments or evidence to support your answer.

No response

Question 17: Do you have any other comments regarding the design and methodology for the Smart Readiness metric?

We recommend that the government undertake consumer research to support the introduction of this metric and ensure that the design and communication of the metric supports consumer understanding of the technologies that are included, the rating system, and the benefits they can deliver.

Our consumer research in 2024 suggested that consumers struggled to understand what was meant by a Smart Metric. Other pieces of research have identified a mixed picture in terms of consumer understanding and engagement with the technologies that may be included in the metric, for example our 2025 sustainability tracker found that around 60% of homeowners either owned or were open to installing solar thermal panels, solar PV panels and batteries. However the Public Attitudes Tracker research from 2023/24 found that awareness of smart tariffs was low.

Energy cost metric

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Question 18: Do you agree with our proposed approach to the design and methodology for the Energy Cost metric?
Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any comments or evidence to support your answer.

Agree. Our research showed that consumers want to understand the potential energy costs associated with different properties. However the previous EER was often misunderstood and it is important to develop a metric that is clear and more easily understood.

Developing a metric that uses the information from the other three metrics supports consumers that may be limited in the improvements they could make in one area but have sought to compensate through other improvements. For example a property owner that has chosen direct electric heating due to the limitations of the property but has compensated for this through fabric efficiency improvements, solar panels and batteries should see the benefit in an improved cost metric rating.

Question 19: Do you agree that the cost metric should be presented in £, rather than bands?

Response options: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree. Please provide any comments or evidence to support your answer.

Disagree.

We are concerned that the proposal to present energy costs as an absolute figure based on energy prices at the time of the assessment will result in information that quickly becomes out of date. This is a particularly strong risk given the government's decision to maintain the ten year validity period for EPCs. Whilst we accept the intention is to supplement this with a link to more up to date information, the presentation of a single figure risks misunderstanding and will not support comparison between different properties.

We encourage the government to explore the possibility of developing a numeric score based on fuel type and expected use in kWh. This can then be presented in A-G bands. As is suggested in the consultation, consumers could then use a link that is provided in the EPC to convert this into an up-to-date estimate of energy costs based on current gas and electricity costs.

As with the other proposals included in this consultation this should be tested with consumers to ensure understanding.

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