



DCHI Working Group

Output document

Guidance on unconditioned spaces
issued to NES assessors

Topic

Treatment of unconditioned zones – fuel type availability

Background

Guidance issued on 24th June by NES is a cause for grave concern to DCHI. It appears illogical, does not match our understanding of the position of the majority of accreditations and produces a falsely enhanced result.

Introduction / overview

The following guidance was issued to NES assessors.

Where the activity requires conditioning, fixed equipment is not present and indirect conditioning cannot be assumed, then a default system type should be selected based on the *fuel availability* on site as follows :-

Gas or other fuel present - The default heating system **Heating only—Other systems** should be used and the default fuel type set to 'Gas' or the type of fuel available in the property.

Electricity present only—The default heating system **Heating only—Electric Resistance** should be used.

(We will ignore for the moment the fact that the software options available for selection do not appear to have either of the heating systems that should apparently used identified by names looking anything like those in the guidance. We think we know what they are intended to mean).

Strengths

1. It is an attempt to provide much needed guidance

Weaknesses

1. "Availability" of fuel bears no relationship to "ability to use" the fuel to heat the property.
2. What is "fuel availability" anyway? If a premises has an LPG cooker with a cylinder outside the window does that mean LPG is available to heat the building? What if the cylinder is empty, is LPG still available? What if they have a pile of logs because one of the rooms has an open fire, do we assume zones without fixed heating throughout the whole building will be heated by wood logs?
3. Conventional wisdom is you only treat gas as supplying the HVAC when there is a gas supply connected to a gas appliance. It doesn't have to be working but it does have to be there. Logically the same applies to all fuels except electricity (since electric heating can be portable).
4. You can treat gas as 'available for a recommended improvement' when there is gas into the property but it is not connected to a gas appliance. It is not however our job to rate a building based on what it could be if it is improved; we have to rate it as it stands on the day assessed. It is counter-intuitive to treat gas as actually supplying the heating when there is no appliance present.
5. In the situation referred to by NES the incoming occupier is not able to use the gas supply to provide heating without investing in installing something which will be an upgrade to the property and therefore is not intrinsic. A rating based on gas is a false and misleading rating.
6. In the absence of fixed heating, the only way an incoming occupier can heat the building (other than portable gas heaters which would be most unusual) without "altering the property" is plug in some form of electric heating, therefore the only type of heating that

can be assumed in the absence of fixed appliances is electric heating and the consensus view has been that worst case should apply i.e. fanned electric heating.

7. The guidance from all accreditations has always been that if in doubt opt for the lower efficiency. If there is no fixed heating then crediting gas when it cannot be used, without significant capital investment in upgrading the building, is doing exactly the opposite and introducing a false positive.
8. It is not sensible to assume that gas to the property means gas heating is practical. It is not unusual to find a gas supply to one zone containing a commercial kitchen for example. The other 20-30 zones in the pub/restaurant are heated by fixed or portable electric heating (or not at all). It would cost thousands to use gas to heat those zones, but assuming it will be used quite possibly raises the EPC perhaps as much as two bands. That would be misleading the incoming occupier and any we should get sued for it which is why it is not appropriate for any accreditation to recommend doing it.
9. For the zones in question, when we are there we will often see a portable electric heater in the corner or stuck in a cupboard and used on cold days. I have never seen a spare boiler or gas fire in a cupboard that comes out and gets connected on a cold day. If there is no gas appliance fitted the occupier will not be using gas to heat the zone, simples!

Opportunities

1. There is a need for clear and appropriate guidance in this area and correction of this using terms agreed by the conventions groups is an ideal opportunity to provide a consistent approach.
2. Most assessors are happy to accept the concept of using plug in electric heating to heat a zone that has no fixed heating. It is the same logic as portable electric heating in RdSAP and there is a drive to bring the two methodologies closer together.

Threats

1. The guidance issued is a retrograde step in that it goes against the current logic of most accreditations and maintains inconsistency, it introduces confusion that need not exist and it gives the building a better energy efficiency rating than the incoming occupier will actually be able to use.
2. Not resolving this with a clear convention would allow inconsistency to remain.
3. It would also place assessors at risk of being sued for the cost of upgrading a property to deliver the standard of energy efficiency indicated by the rating. (*While insurance should protect to some extent if the assessor has acted on inappropriate guidance it will not cover the time element or loss of reputation*).

Summary

The weaknesses in this guidance far outweigh any potential benefit however there is an opportunity to use this as a trigger for a more appropriate convention to resolve an ongoing issue.

Conclusion

There is a clear need for the Conventions Group to issue consistent guidance, and the guidance issued by NES is unsafe as can be seen from the extent of the weaknesses listed above.

Consistency of EPCs is being held back by the failure of the accreditations to deal appropriately and consistently with the issue of zones without fixed heating. DCHI has repeatedly offered workable solutions that could be introduced as they are presented or with minor adjustments / additional points of clarification. Despite this assessors remain hampered by inertia among the accreditations.

Once again we are able include a recommendation based on experience of live survey situations that would appear to provide consistency in a practical manner.

Recommendation

The guidance has to be simply:

Irrespective of what fuels are available in the property (as long as electricity is present) if there is no fixed heating and no indirect heating of a zone (no current way of using the fuel to heat that zone) fanned electric heating must be assumed for zones where the activity requires heating.

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