

Home Energy Model Consultation

Generation Rent submission

March 2026

Generation Rent welcomes the opportunity to respond to this consultation. We are not experts on the technical side of energy assessments so our particular interest is providing the perspective of private renters and how these proposals could affect them.

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?

Neither agree nor disagree.

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 assessor's workloads, costs, training, and skills.
- c) Implementation risks, for example: QA/audit and fraud risk, supply-chain readiness and training needs.
- d) Anything else you feel is relevant.

The modular approach needs to be transparent and repeatable, particularly as EPCs are a measure of compliance with new Minimum Energy Efficiency Standard (MEES) regulations in the Private Rented Sector (PRS), a key strategy for alleviating the [993,000 private renter households](#) living in fuel poverty. [New MEES requirements](#) will come into effect in 2030 in the PRS, requiring some landlord to retrofit their properties to achieve the new minimum EPC standard of C.

Converted flats are more likely to be rented, so it is important that they can be assessed appropriately, and a modular approach may help with this. A modular approach may allow the government and local housing associations to more accurately review the exact impacts of fuel poverty alleviation schemes and/or green finance products by reflecting real world performance. This could also help private renters understand the actual impact of a retrofit

on their energy bills by being a potentially more accurate and reliable way of measuring an actual reduction in energy or carbon use.

However, there are concerns that a modular approach may lead to an increased opportunity for landlords to defraud or misrepresent their properties, especially for those who have to invest significantly in retrofits to make their homes MEES compliant. Non-compliant landlords can currently defraud the regulations by illegally paying an EPC assessor to adjust EPCs by changing certain metrics like the floor area, to increase their overall score. There are also higher costs associated with the new data inputs in this approach, with the complexity of the new information needed meaning a higher level of competence is required for EPC assessors.

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

No view.

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?

No view.

Question 5: Do you agree with the proposal to evaluate fabric performance using FEE?

Neither agree nor disagree.

Question 6: Do you agree with the approach to maintain close equivalence between the C/D boundary in the current EER rating and the C/D boundary in the Fabric Performance Metric?

Neither agree nor disagree.

Maintaining a close equivalence of the C/D boundaries supports a smooth transition for MEES in the PRS.

Question 7: Do you agree with the Government's proposal to introduce an option for recording Heat Transfer Coefficients based on SMETER measurements in the EPC system, as supplementary information about fabric performance?

Neither agree nor disagree.

A lot of private renters do not have influence over whether a smart meter is put into their home or not, with limited powers to demand one. However, smart meters are an important way for tenants to manage their energy use and save on energy bills, particularly when there are also solar panels and batteries working together. A good practice would be for landlords to work with energy suppliers to put smart meters in their properties before the new occupant comes in. A concern is that SMETER rollout could be uneven across the population, where underserved groups in the PRS will get missed out from this new technology.

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.

No

Question 9: Do you agree with our proposal on the design and methodology for the Heating System metric?

Neither agree nor disagree.

Heat pumps have the potential to be more efficient than gas boilers, particularly if electricity prices fall in relation to gas. However, landlords tend to be hesitant to install heat pumps due

to the [split incentive](#), whereby landlords bear the upfront costs of retrofit installations but do not live in the property to gain the benefits through reduced energy bills. For that reason, we welcome the financial support for the installation of heat pumps on top of what landlords are required to spend out of their own pocket.

Crucially, for green retrofits to be viable and benefit renters directly, more needs to be done to bring down the cost of energy. Many private renters from marginalised backgrounds (migrants, ethnic minorities, working class, the elderly, those with disabilities) are most likely to be living in fuel poverty so require cheap-to-run and energy-efficient retrofits urgently.

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?

Agree.

It is vital that installing direct electric heating systems does not allow landlords to achieve the MEES of EPC C, as these systems are relatively cheap for them to install, whilst being significantly more expensive for tenants to run, despite improving energy efficiency standards. Therefore, it is key to disincentivise direct electric systems being retrofitted in PRS homes in particular to avoid more expensive forms of heating being favoured. They are also much [less efficient](#) than technologies like heat pumps.

[Storage-based technologies](#) are cheaper to run by making use of off-peak electricity prices so should be favoured, however more clarity is required to understand what these technologies actually entail, and how renters can make best use of them and avoid racking up large bills inadvertently. Fundamentally, the rating system must not make it easy for landlords to achieve MEES compliance by installing cheap, inefficient and expensive-to-run technologies.

Question 11: What is your view on the option of reserving the highest scores of A/B for electric cooking appliances? Do you have any views on how these could be reflected in EPCs (whether in terms of banding or advice to consumers?)

Neither agree nor disagree.

Whilst it is important that older, less efficient electric appliances do not receive the same EPC score as more efficient ones, in some cases where cooking uses a relatively small proportion of the home's energy demand, perhaps it should not dictate the overall EPC score of the whole property. Similarly, cooking is often a multi-appliance practice compared with heating systems, so maybe EPC should not be reflected in a metric requirement based on one cooking appliance. Additionally, different cultural demographics prefer gas cooking with a flame so this should be considered. On the other hand, it is potentially beneficial to disincentive gas cooking for the [health of the occupants](#) in terms of indoor air quality. This could be influenced by the Government in other ways however, rather than being built into EPC metrics.

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.

Smart meters, heating controls, and solar technology installation would be beneficial reducing energy bills for private renters, but there should be safeguards in place to prevent landlords from increasing rent to such an extent that renters do not benefit from these improvements, and could even end up paying more in rent than they save on energy bills, especially if landlords will achieve compliance with MEES by installing them.

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

In properties like some flats where landlords are not able to install solar technologies, and therefore not able to achieve a smart readiness rating of C, landlords will get relevant exemptions under MEES. However, in these cases we have concerns that landlords will also have no incentive to install low carbon heating. Homes that cannot get access to solar batteries will not be adequately represented by this smart readiness metric.

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

No

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

No

Questions 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?

Neither agree nor disagree.

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

No

Question 18: Do you agree with our proposed approach to the design and methodology for the Energy Cost metric?

Agree.

Renters need the full information about the projected energy costs of a property to make informed decisions about which homes they choose to rent. For example, if Home A is listed at a higher rent than Home B, Home A may work out as a better deal overall if the estimate energy bills are a lot lower than for Home B. The current EPC makes it hard to work out these differences reliably.

Private renters are more likely to move home in a given year compared to home owners, so the experience of renters should be a big factor in the usability of EPCs. Current EPCs do not permit tenants to make informed decisions to calculate energy costs due to the volatile energy cap, as well as the language of EPCs being highly technical, and therefore broadly inaccessible. The energy cost metric will be important in allowing renters to compare the energy efficiency of properties but needs to stay up to date with current and dynamic energy prices. While signposting to current energy prices would be better than the status quo, ideally the EPC accessible online would contain a field for estimated energy costs that would update as the price cap changes so properties become comparable. If this is not possible, then it will be important to make EPC data exportable for use in third party websites/calculator tools to assist renters (and purchasers) when comparing properties, perhaps also personalised to their own energy behaviours at that specific point in time.

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

Strongly agree.

Presenting energy costs in £ rather than an abstract band rating makes understand energy efficiency more accessible to the ordinary person so is vital. Bands would make it much more difficult for consumers to compare properties. It could make a significant difference between a tenant choosing a more expensive home to rent/heat and choosing a cheaper one.