BBP | BETTER BUILDINGS PARTNERSHIP

ENERGY PERFORMANCE CERTIFICATE PROCUREMENT PRINCIPLES

Guidance for Property Owners and Managing Agents Procuring Energy Performance Certificates (EPCs) for Commercial Buildings in England and Wales.

JUNE 2025

Contents

Executive Summary

In the Governments own words, Energy Performance Certificates (EPCs) "promote the improvement of the energy performance of buildings and are intended to identify ways in which the energy consumption of buildings and associated costs can be reduced[1]." Required when a building is constructed, sold, rented out, or has a major change to its number of parts for separate occupation (with provision or extension of fixed building services) - EPCs have undoubtedly had a significant impact on commercial property since their introduction in 2008.

The original legislative basis for EPCs was the Energy Performance of Buildings Directive – transposed into UK law through the Energy Performance of Buildings Regulations – and they are currently the only ubiquitous energy performance-related compliance requirement across existing buildings in England and Wales. As such, they are a vital tool and used by a wide range of stakeholders to assess commercial buildings including the Government, investors, occupiers and lenders.

Done well, an EPC is a valuable digital record of a building. Furthermore, despite widely understood challenges with using EPCs as a sole indicator for energy performance, EPCs do have a role to play in identifying opportunities to increase energy efficiency and where capital investments should be made. They should therefore not be seen as just a 'tick-box' exercise.

However, to fully leverage the value of EPCs, the data underpinning the EPC assessment should where possible be based on actual building data for the asset being assessed, as opposed to so-called 'default values', and this information/evidence handed to the client at the end of the process, along with other key outputs (e.g. XML file and building energy model). Assessments should be completed at the right level, using the right calculation tool, in the right software environment, and by a competent assessor. And lastly, where appropriate, EPC assessments should ideally be aligned to the development of accurate Minimum Energy Efficiency Standards (MEES) and/or net zero strategies.

Through its seven EPC procurement principles, this document intends to equip property owners and managers with a robust understanding of key aspects of the EPC process, and in so doing enable those parties to procure better quality EPCs, gain access to the underlying data, and align EPCs with broader asset management strategies[2].

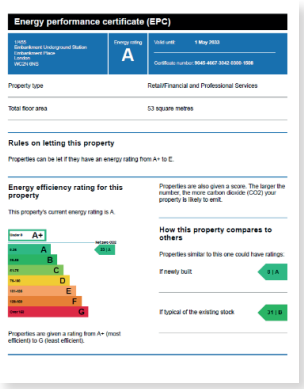
Table 1 Summary of BBP Energy Performance Certificate Procurement Principles.

Certification Scope Read more>	• In general, **commission whole building EPC assessments**, rather than commissioning EPC assessments for separate parts of buildings (e.g. a particular floor or area). • However, there may be instances where an EPC for a separate part of a building is preferred, such as where the property owner refurbishes a single floor and commissions a discrete EPC to capitalise on an improved EPC rating.
Data In Read more>	• **All parties (including the assessor and client)** should commit to working together to **ensure that good data is made available** from the outset, and to **minimise the use of 'default values'**. • **Assessors should be clear** and transparent in relation to **where default data has been used** instead of actual data, and why. This should take the form of a **data gap analysis** that is provided to the client **prior to lodgement**, and the client/client's team should be given an opportunity to review and rectify any data gaps. **No EPC should be lodged without discussion and explicit approval by the client**. • **Relatedly, it is crucial to ensure the correct address for the building is used**. The right postcode should be employed to supersede the previous EPC when lodging the new one. When performing an EPC for part of a building, it's essential that it is clearly specified in the address. Business names should be avoided in the address.
Data Out Read more>	• **Building owners should require assessors to share a copy of the latest XML file and building energy model[3], as well as all supporting evidence gathered during the assessment process**. This data will be the intellectual property (IP) of the building owner for use on future assessments and in wider asset management improvement initiatives (e.g. net zero strategies).
Levels and Calculation Tools Read more>	• As a minimum, commission the level and calculation tool for an EPC assessment in line with the National Calculation Methodology, and **consider voluntarily commissioning at a higher level (e.g. Level 5) to benefit from higher levels of granularity and adaptability of output (i.e. dynamic simulation modelling - DSM)**.
Software Products Read more>	• Ensure that the EPC assessment is modelled using industry standard software and with onward data sharing capabilities. • **Standardise software products used by EPC providers across a portfolio.** • **Seek to agree a preferred EPC modelling software with M&E consultants.**
Assessors Read more>	• Use qualified EPC assessors, from organisations with a **demonstrable track record**, and agree appropriate contractual protections (e.g. liability and professional indemnity insurance levels). • Consider experience with, and capability to, engage with design and project teams working on improvement plans.
MEES Strategy and Net Zero Audits Read more>	• MEES strategy - Agree an appropriate and clear assessment scope with the EPC assessor, in line with the assessment scope set out in Table 4. • Net zero audits - Agree an appropriate and clear assessment scope with the EPC assessor/separate consultant, in line with the assessment scope set out in Table 4. • **In most instances, where MEES strategy and net zero audits are being procured on top of an EPC, it will be most effective/efficient to commission a Level 5 EPC assessment, using dynamic simulation modelling (DSM).**

Introduction

Energy Performance Certificates

A valid energy performance certificate (EPC) is required when a building is constructed, sold, rented out, or has a major change to its number of parts for separate occupation (with provision or extension of fixed building services) – so-called 'trigger events'. EPCs are valid for a period of 10 years, unless superseded by a newer EPC.


Energy performance certificate (EPC)

A

Property type: Retail/Financial and Professional Services

Total floor area: 53 square metres

Rules on letting this property

Properties can be let if they have an energy rating from A+ to E.

Energy efficiency rating for this property

This property's current energy rating is A.

How this property compares to others

Properties similar to this one could have ratings:

If newly built: 91 | A

If typical of the existing stock: 35 | E

Properties are given a rating from A+ (most efficient) to G (least efficient).

An EPC is undertaken by a qualified and accredited energy assessor who conducts a site inspection to examine key building elements related to energy performance. Their observations are inputted into specialist software, which creates a building energy model for upload into a government portal. The publicly available outputs include a PDF certificate inclusive of overall energy rating, score and a supporting recommendation report. Not currently publicly available and often not shared between assessor and property owner are the 'XML' file and building energy model that sit behind the certificate.

Importantly, EPCs do not measure performance in use, and only provide an uncosted list of improvement recommendations that are often not feasibility tested. However, if the process is approached strategically and with additional outputs requested, EPCs have the potential to play an important role in identifying energy efficiency improvement opportunities and support long term asset value protection and creation for property owners.

Potential EPC reform

On 4th December 2024, the Government published an open consultation on proposed reforms to the EPC regime. The consultation covered several areas, including validity periods, data management protocols, heritage buildings, quality control and enforcement. We note that generally there is good alignment between these potential reforms and the procurement principles outlined in this document and we will update this guidance once the results of the consultation are published.

Minimum Energy Efficiency Standards

Minimum Energy Efficiency Standards (MEES) legislation currently makes it unlawful to lease a non-domestic property with a valid EPC rating below an E (i.e. F or G). Notwithstanding this, there are various exemptions scenarios, which [where applicable] enable property owners to continue to let out properties with an EPC rating below E. Detailed information on these exemptions and the registration process is available on the Government website: Non-domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK

In 2021, the UK Government consulted on further tightening MEES legislation, such that all buildings would be required to have a valid EPC by 2025, and the minimum EPC rating level would become:

- EPC C by April 2027; and
- EPC B by April 2030.

The BBP response to this consultation can be found here.

In October 2023, the UK Government communicated that this proposed policy requirement was under review, and in December 2024 updated that they were "planning to publish the response to the Non-Domestic Private Renter Sector MEES consultation early in 2025".

Despite this ongoing regulatory uncertainty, EPC B remains the de facto target minimum 2030 standard for many building owners. Beyond the regulatory environment, EPC B or higher has become established as a key criterion and consideration for many investors, occupiers and lenders.

Listed Buildings – EPC Exemptions and MEES Exemptions

EPC Exemptions

Contrary to popular opinion, listed buildings and buildings within conservation areas are generally not exempt from having an EPC. Only when an EPC is prepared, and the draft rating is F or G, and the works needed to improve the property to E or better would unacceptably alter its character or appearance, can an exemption from needing an EPC be claimed. This 'EPC exemption' does not need to be registered anywhere.

MEES Exemptions

Alternatively, if an EPC has previously been lodged at F or G and is still valid then a standard 'MEES exemption' must be registered[4]. For further guidance, see BBP Guidance Minimum Energy Efficiency Standard and Heritage Properties.

Energy Performance Certificate Procurement Principles

EPCs are increasingly a strategic issue for commercial real estate in the UK, including in relation to minimising risk and protecting asset value. When done well, an EPC is also a valuable digital record of a building. Furthermore, despite widely understood challenges with using EPCs as a sole indicator for energy performance, EPCs do have a role to play in identifying opportunities to increase energy efficiency and where capital investments should be made. They should therefore not be seen as just a 'tick-box' exercise.

However, to fully leverage the value of EPCs, the data underpinning the EPC assessment should where possible be based on actual building data for the asset being assessed, as opposed to so-called 'default values', and this information/evidence handed to the client at the end of the process, along with other key outputs (e.g. XML file and building energy model). Assessments should be completed at the right level, using the right calculation tool, in the right software environment, and by a competent assessor. And lastly, where appropriate, EPC assessments should ideally be aligned to the development of accurate MEES and/or net zero strategies.

To ensure individual EPCs are consistently accurate and valuable, client requirements should be clearly defined and fed into the procurement process.

To this end, the BBP and MAP Membership have produced seven EPC procurement principles to support property owners and managers develop and present clear expectations in relation to:

1. **Certification Scope:** Defining certification scope
2. **Data In:** Ensuring data integrity and quality
3. **Data Out:** Capturing a broader set of EPC outputs (e.g. XML, building energy model, and supporting evidence gathered during the assessment)
4. **Levels and Calculation Tools:** Setting assessment levels and selecting calculation tools
5. **Software Products:** Choosing assessment software products
6. **Assessors:** Using high quality assessors
7. **MEES Strategy and Net Zero Audits:** Aligning EPC assessments with MEES and net zero strategy

Procurement Principles

CERTIFICATION SCOPE

Background

From a compliance perspective, the acceptable scope of an EPC is dictated by a building's use, occupancy pattern and the set-up of the plant. In general:

- Where a building has a common heating system, an EPC can be prepared to cover the whole building, and separate EPCs can be prepared for individual parts (e.g. independently occupied demise or area), if required.
- Where demises or areas of a building are independently heated and occupied, individual EPCs are required for each part.
- Where demises or areas of a building are independently heated but its sold or rented out as a whole building, an EPC can be prepared for the whole building, or individual EPCs can be prepared for each part, plus another one for the conditioned communal areas.

For further guidance, see Chapter 4: Building use, tenancy arrangements and the requirements for EPCs, from A guide to energy performance certificates for the construction sale and let of non-dwellings.

Generally and as long as its compliant, building owners prefer whole building EPCs, as they allow for simpler tracking of EPCs and MEES, and wider asset management planning (e.g. M&E design, net zero). However, of course there may be instances where an EPC for a separate part of a building is preferred, such as where the property owner refurbishes a single unit/floor and commissions a discrete EPC to capitalise on an improved EPC rating.

Procurement Principles

- In general, **commission whole building EPC assessments**, rather than commissioning EPC assessments for separate parts of buildings (e.g. a particular floor or area).
- However, there may be instances where an EPC for a separate part of a building is preferred, such as where the property owner refurbishes a single floor and commissions a discrete EPC to capitalise on an improved EPC rating.
- All assessments must comply with government EPC guidelines. Specifically, when preparing a discrete space EPC, the area in question must be designed or altered for separate use.

DATA IN

Background

A significant amount of building specific data is required to generate an EPC – including floor plans, lighting designs, HVAC design and specification details relating to walls, roofs and glazing. Where specific information is not obtained, so-called 'default values' can be used to enable an EPC to be completed. Generally, defaults are based on a worst-case scenario, and therefore the more defaults one uses, the greater the likelihood of a rating that is less than the building could potentially achieve.

In general and at present, those commissioning EPC assessments do not have visibility of gaps and inaccuracies, including how much of the data that supports the EPC rating is based on defaults.

Improving the way property owners and managers work with EPC assessors at the 'data in' stage is key to improving EPC accuracy and the utility of EPC assessments as digital records.

Procurement Principles

- **All parties (including the assessor and client)** should commit to working together to **ensure that good data is made available** from the outset, and to **minimise the use of 'default values'**.
- **Assessors should be clear** and transparent in relation **to where default data has been used** instead of actual data, and why. This should take the form of **a data gap analysis** that is provided to the client **prior to lodgement**, and the client/client's team should be given an opportunity to review and rectify any data gaps. **No EPC should be lodged without discussion and explicit approval by the client**.
- **Relatedly, it is crucial to ensure the correct address for the building is used**. The right postcode should be employed to supersede the previous EPC when lodging the new one. When performing an EPC for part of a building, it's essential that it is clearly specified in the address. Business names should be avoided in the address.

DATA OUT

Background

If the recommendations of the 'Data In' section are followed and the input data are as accurate as possible, then EPC assessments can start to be viewed as a valuable record of building information. Currently, at the end of an EPC assessment, building owners generally only gain access to the publicly available energy rating, score and a supporting recommendation report. Typically, there is no expectation that the EPC assessor will share the supporting assessment (i.e. XML file and/or building energy model that sit behind the certificate). In many cases, building owners will not have access to previous EPC supplier(s), and where they do, EPC assessors may feel they own the data and are unwilling to share it.

If expectations can be set at the beginning of an assessment that the data that sits behind an EPC will be shared, it will enable:

- EPC assessment data sets to be updated and built on over time, rather than starting from scratch for each assessment (with potential to save on fees);
- A two-way flow of information between EPCs and related wider asset management initiatives, such as net zero.

Procurement Principles

- **Building owners should require assessors to share a copy of the latest XML file and building energy model[5], as well as all supporting evidence gathered during the assessment process**. This data will be the intellectual property (IP) of the building owner for use on future assessments and in wider asset management improvement initiatives (e.g. net zero strategies).

LEVELS AND CALCULATION TOOLS

Background - Levels

There are three levels of EPC for non-domestic buildings: Level 3, 4 and 5. The choice of assessment level should be guided by the legislation (summarised in Table 2), however in short, levels vary according to the complexity of a building and its fixed services, with Level 3 being the simplest and Level 5 the most complex. New buildings must be assessed at Level 4 or 5.

Table 2 Summary of the regulatory requirements for EPC assessment levels.

Level	Non-Domestic EPC Conventions – EPC level requirements	Indicative Assessment Cost
5	• Automatic blind control • Atria (conditioned or unconditioned) • Enhanced night ventilation strategies that expose significant building components, beyond just surfaces, to cool night air, increasing the building's capacity to offset daytime cooling needs	£££
4	• Certain controls strategies, including demand control and night ventilation/cooling (other than those strategies covered in Level 5) • Steam, high or medium temperature water distribution systems • Centralised air systems or partially centralised air/water systems[6] providing heating and/or cooling • Mechanical ventilation systems served by a centralised air handling unit(s) • New build properties	££
3	• Everything else – typically simple HVAC systems	£-££

For more information, see The UK's National Calculation Method for Non Domestic Buildings Commercial EPC Conventions for England and Wales Issue 9 (p.31).

Importantly, there is flexibility to optionally go up the 'Levels' scale, but not down. A property owner or manager may voluntarily decide to assess at a higher level than is required for compliance where it's beneficial to a building's asset management strategy (e.g. where detailed modelling is already being conducted as part of net zero). Of course, it is important to note that a more accurate model and EPC assessment may or may not result in a more favourable ultimate EPC score/rating.

Background – Calculation tools

As per official guidance, "The appropriate software tools for commercial buildings are simplified building energy model (SBEM) or dynamic simulation model (DSM). The software produces the certificate and the recommendation report for the building. Only government approved software may be used to assess the energy performance of a building and to produce the EPC."[7]

The EPC level determines the required simulation/energy calculation tool for assessment:

- Levels 3 and 4: Utilise the Simplified Building Energy Model (SBEM).
- Level 5: Requires the Dynamic Simulation Model (DSM).

Simplified Building Energy Model (SBEM)

- Due to its modelling capability, SBEM is restricted to Level 3 and 4 assessments.
- With simplified modelling functionality, SBEM has fewer design capabilities.

Dynamic Simulation Model (DSM)

- An EPC produced using DSM is considered the most accurate. It provides access to detailed energy, comfort, and engineering metrics not available in SBEM.
- DSM can be applied to any building and can be repurposed for various applications (e.g. heat load calculations for plant sizing, BREEAM and NABERS).
- A DSM model is considered a significant proportion of the way towards a real building energy model or digital twin and yields what is sometimes described as an 'investment-grade' EPC.
- All DSM assessments will be captured as Level 5 on an EPC certificate. As already mentioned, it is fine to assess a Level 3 or 4 building as Level 5.
- DSM assessments may be in the order of 30-40% more expensive than an SBEM assessment.
- Recommended for any building (simple or complex) where anticipate future energy improvement-related design, either to improve the EPC or for wider asset management related purposes (e.g. net zero).

Procurement Principles

- As a minimum, commission the level and calculation tool for an EPC assessment in line with the National Calculation Methodology, and **consider voluntarily commissioning at a higher level (e.g. Level 5) to benefit from higher levels of granularity and adaptability of output (i.e. dynamic simulation modelling - DSM)**.

SOFTWARE PRODUCTS

Background

Various software products can be used to perform SBEM and DSM calculations – see examples listed in Table 3.

Table 3 Example software products and their calculation tool capabilities.

	Calculation Tool Capability	
Software Product	**SBEM**	**DSM**
iSBEM	✓	
EnergySimulator	✓	
G-ISBEM	✓	
Lifespan SBEM	✓	
SBEM Online	✓	
IES VE	✓	✓
DesignBuilder	✓	✓
EDSL Tas		✓

A key consideration during software selection should be consistency. Procuring EPCs assessed through the same software tool can lead to synergies between EPC assessments and energy improvement-related design activities – i.e. if procured in the same software environment, EPC assessors and M&E consultants will be able to share building energy models. It's important to note that assessors and consultants tend to adopt a particular software tool. Synergy between EPC assessments and M&E consultancy may therefore depend on selecting providers that have adopted the same software tool.

Procurement Principles

- Ensure that the EPC assessment is modelled using industry standard software and with onward data sharing capabilities.
- **Standardise software products used by EPC providers across a portfolio.**
- **Seek to agree a preferred EPC modelling software with M&E consultants.**

ASSESSORS

Background

Like anything, EPC assessors can vary in terms of experience and quality. Furthermore, for the simpler assessments (e.g. Level 3 and 4) the barriers to entry for becoming an EPC assessor are lower.

At the other end of the spectrum, and due to higher barriers to entry, there is an acknowledged shortage of Level 5 EPC assessors in the market. Furthermore, in an increasing number of instances there is also a need for assessors to be able to converse on a technical level with design and project teams working on improvement plans.

Procurement Principles

- Use qualified EPC assessors, from organisations with a **demonstrable track record**, and agree appropriate contractual protections (e.g. liability and professional indemnity insurance levels).
- Consider experience with, and capability to, engage with design and project teams working on improvement plans.

MEES STRATEGY AND NET ZERO AUDITS

Background

Generally, an EPC assessor's entry level product will be a basic 'EPC only' service. This will include the mandatory recommendations report, however, those recommendations will be high-level and often not feasibility tested. Furthermore, the assessor will not automatically outline a specific 'MEES strategy' – i.e. interventions required to bring a building in line with current (i.e. EPC E) or future proposed (i.e. EPC B) MEES levels.

Additionally, whilst there is some overlap, EPCs/MEES assessments and net zero audits seek to achieve different outcomes and as a result EPC assessors are not likely to provide net zero audits as part of their entry level product, and in many instances EPC assessors lack the technical capability to provide net zero advice (and vice versa net zero advisors may not be qualified EPC assessors). The key differences between EPC assessments, MEES strategy and net zero audits, in general, are summarised in Table 4.

Table 4 Summary of key differences between EPC assessments, MEES strategy and net zero audits, in general.

	Scope	Output	Indicative Cost
EPC only	Assessment of a building's construction quality, focussing on so-called 'regulated' energy and considering factors such as building fabric, services, orientation, and on-site renewable systems.	Basic EPC, inclusive of score, rating, certificate and recommendations report.	£
MEES strategy		Intervention(s) required to achieve or surpass current or future minimum energy efficiency standard (MEES) levels (e.g. EPC B or higher by 2030) and estimated associated capital expenditure.	££
Net zero audit	Holistic assessment of building performance, encompassing all energy consumption - including regulated and 'unregulated' energy (such as small power), and accounting for occupancy patterns (operating schedules/ temperature setpoints).	Assessment of intervention(s) required to achieve alignment with Paris 1.5°C benchmarks (e.g. Carbon Risk Real Estate Monitor -CRREM v2) and/or net zero benchmarks (e.g. UK GBC, LETi, PassivHaus, UK Net Zero Carbon Buildings Standard), estimated impact on EPC and associated capital expenditure.	£££

Despite these differences, it is technically possible to procure EPCs, MEES strategies and net zero audits through a single consultant, who may then utilise different expertise within their teams to fulfil the brief. Even if not procured through the same consultant, it's important to recognise that there may be some overlap between these processes particularly regarding data gathering, but also analysis and outturn interventions recommended. These overlaps will be optimised where the recommendations of other sections are followed, for example:

- the 'Data In' section (i.e. EPC input data are as accurate as possible);
- the 'Data Out' section (i.e. EPC building energy models are captured);
- the 'Levels and Calculation Tools' section (i.e. Level 5/DSM assessments are conducted); and,
- the 'Assessors' sections (i.e. EPC assessors can converse at the required technical level).

Procurement Principles

- MEES strategy – Agree an appropriate and clear assessment scope with the EPC assessor, in line with the assessment scope set out in Table 4.
- Net zero audits – Agree an appropriate and clear assessment scope with the EPC assessor/separate consultant, in line with the assessment scope set out in Table 4.
- **In most instances, where MEES strategy and net zero audits are being procured on top of an EPC, it will be most effective/efficient to commission a Level 5 EPC assessment, using dynamic simulation modelling (DSM).**

Concluding Remarks

When procuring EPCs, property owners, managers and EPC assessors should work together to understand and agree the objectives for the EPC rating, any cost implications of implementing a more robust process (as outlined in this document) and the value it will add to understanding their assets in the context of their business requirements and entity, portfolio or fund level sustainability strategies.

Where it is deemed appropriate to invest in a higher quality process and output, EPCs have the potential to be a powerful tool in driving energy efficiency and unlocking value in commercial real estate.

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Glossary of Terms

XML File – A structured text file that uses tags to store and organize data in a machine-readable format, commonly used for data exchange.

Minimum Energy Efficiency Standards (MEES) – UK regulations that set the minimum energy efficiency level for buildings, requiring landlords to improve properties with low energy ratings.

Simplified Building Energy Model (SBEM) – A calculation method used to assess the energy performance of non-domestic buildings for compliance with regulations.

Dynamic Simulation Model (DSM) – An advanced energy modelling tool that simulates a building's energy use over time, considering factors like weather, occupancy, and HVAC systems.

Net Zero Audit – A comprehensive assessment of a building's carbon footprint, evaluating energy use, emissions, and efficiency measures to identify steps for achieving net-zero carbon status.

References

1 A guide to energy performance certificates for the construction sale and let of non-dwellings, 2017.

2 Note: This guidance is focussed on non-domestic EPCs/buildings in England and Wales.

3 The reason for providing the XML and the building energy model (which is used to generate an XML) is complicated but in essence because there may be many XMLfiles within a model (as many as there are simulations). As a result, it can sometimes be difficult to retrospectively isolate the XMLfile for a lodged EPC.

4 https://www.gov.uk/government/publications/private-rented-sector-minimum-energy-efficiency-standard-exemptions/guidance-on-prs-exemptions-and-exemptions-register-evidence-requirements

5 The reason for providing the XML and the building energy model (which is used to generate an XML) is complicated but in essence because there may be many XMLfiles within a model (as many as there are simulations). As a result, it can sometimes be difficult to retrospectively isolate the XMLfile for a lodged EPC.

6 The system type definitions in Figure 7.4 of CIBSE Guide F: Energy Efficiency in Buildings have been adopted and applied within the EPC Conventions.

7 A guide to energy performance certificates for the construction, sale and let of non-dwellings, 2017, Department for Communities and Local Government

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