1. In which capacity are you completing these questions?
Tenant representative group

2. If responding on behalf of an organisation, please specify which organisation:
Generation Rent

3. If responding as an individual, where do you live? If you are responding as part of an organisation, where are you primarily based?
National organisation

12. Do you support bringing in and enforcing the Decent Homes Standard, as set out above, in the private rented sector?
Yes.

Everyone deserves to live in a home that meets basic decency criteria. In the past forty years, as council housing has been privatised and not replaced, the private rented sector has expanded to accommodate many households who would have previously qualified for council housing.

The fact that private sector rented housing a) has not been subject to the Decent Homes Standard in the same way as social housing has since the early 2000s, and b) costs more to rent than social housing, has produced a perverse situation whereby tenants and the state, via the benefits system, are paying more but getting a poorer quality service. It is shameful that millions of people are living in poorer quality homes than they would have been if there had been enough social housing or if all rented homes had been subject to the Decent Homes Standard. This has caused physical and mental health conditions, damage to tenants’ personal property and quality of life, and unnecessary evictions and homelessness as landlords evaded their obligations to maintain their properties with Section 21 notices. We therefore welcome the proposal to implement the Decent Homes Standard in the private rented sector.

Knowing that many of the questions in this consultation are technical, we invited our supporters to complete a truncated survey which replicated the most relevant questions. In total 369 tenants responded and 96% answered “Yes” to this question.

13. How clear is the Standard as set out?
Quite clear.

Generation Rent asked our supporters to read the standard and answer this question. The most common answer was “quite clear”, with 44%. However, 10% found it quite unclear or very unclear, and only 11% found it “very clear”.

A Decent Homes Standard in the private rented sector: consultation

Generation Rent submission

For more information, please contact Dan Wilson Craw danwilsoncraw@generationrent.org

We would add that while a property’s compliance with the Standard may require the judgment of a professional, it is important that tenants can work out if it is likely that their home meets the Standard or not and raise a complaint in the first place. This will require some guidance explaining what the Standard means in practice.

For example, it would help tenants to know if the Standard required a roof to be repaired if fewer than 50% of its tiles are broken or dislodged. Understanding how much fridge and worktop space is needed for a family or household of sharing adults will be essential as well if tenants are to understand their landlord’s obligations. Double glazing can sometimes fail within the 40 years lifespan given for houses – it would help to be clear what requires a window to be replaced as this is not always obvious to a tenant. Wear and tear on a window could be responsible for lower energy efficiency, higher heating costs, and condensation, but could be missed by an Energy Performance Certificate.

14. How difficult do you believe the Standard will be to meet?

Very easy.

Landlords should be setting aside a reasonable portion of their rental income to use to pay for maintenance of their property. They should be well aware of the likely lifespan of the various components of their property and plan works well in advance, using void periods to carry out work before they become a problem for their next tenants.

Where they have long term tenants, they can use the extra income provided by the lack of void periods to provide appropriate temporary accommodation for the tenants if they need to make major repairs during the tenancy.

15. Currently, a property will fail the Decent Homes Standard if a ‘key building component’ (e.g. wall, window, roof) is both old and in poor condition. Should we change the Standard to remove ‘old’ so only the condition is relevant?

Yes.

If a component is not old but in poor condition, then it could still pose a hazard. Furthermore, requiring components to be old to fail compliance could encourage landlords to skimp on repairs and improvements, knowing that they would be immune from enforcement if the component deteriorates before its official “expiry” date. Leaving out a component’s age and making only its condition relevant will encourage landlords to ensure works are of good quality and will stand the test of time.

The only area where age may be relevant is in terms of a component’s energy efficiency, but this should be covered separately by the Minimum Energy Efficiency Standards. Or where condition is good, a component could still require replacement if it is old and also inefficient.

16. Do you think that a landlord’s failure to meet the Decent Homes Standards should be a criminal offence?

Yes.

We note that one of the implications of making failure to comply a criminal offence is that a council must prove the landlord’s guilt beyond reasonable doubt in order to impose a fine, compared with a civil offence which would rely on the balance of probabilities. This may result in fewer actions against non-compliant landlords, so it is important that the rest of the rules are as tight as possible.
and that renters are empowered to take their own action where councils do not. It is essential that failure to comply with Criterion A remains a criminal offence.

17. Should local councils have the option to issue civil penalties or prosecute for Decent Homes Standard offences?

Local councils should have the option to issue civil penalties or prosecute.

Councils will be one of the few actors with the professional expertise to identify non-compliance and they need powers to impose consequences on offending landlords. They should have the option of civil penalties or prosecution. We envisage that civil penalties would be important in swift punitive action against offenders to establish a deterrent effect which would drive compliance among other landlords, as well as help councils recoup the costs of enforcement. Prosecution will still have a place where the council is dealing with especially egregious landlords who may need a banning order.

18. Do you think rent repayment orders should be extended to include Decent Homes Standard offences?

Yes.

We know that many councils are operating on severely reduced budgets and do not always pursue non-compliant landlords. It is essential that there is an avenue for tenants to seek redress where the council cannot provide its full support to a case. Rent repayment orders of up to 12 months’ rent are substantial enough to a) encourage a tenant to apply for them, and b) scare landlords into complying with the law.

19. Do you think that a landlord’s failure to meet their duty to keep a property at Decent Homes Standard should be included as a banning order offence?

Yes.

While there are much more severe banning order offences, it is important that failure to meet the DHS can be treated as such an offence. In some cases, you may have a landlord who only ever breaks the law by letting out non-decent homes. Repeat offences would still warrant a banning order.

20. Do you think that local councils should have the discretion to make properties temporarily exempt from the duty to meet the Decent Homes Standard on a case-by-case basis (with regard to statutory guidance)?

No, there should be no exemptions.

All tenants should be entitled to a decent home, regardless of the type of property or the landlord’s circumstances. If there are any exemptions, it should be clear that the tenant can expect a substantial discount on the rent in relation to the prevailing market rent for similar local properties. See also our response to next question.

Generally speaking, given how stretched council teams are, giving them more decisions to make is counterproductive. Any leeway given to landlords who struggle to meet the Decent Homes Standard for reasons beyond their control should therefore either be set out in legislation or addressed further along the enforcement process.

21. In some instances, carrying out Decent Homes Standard work or repairs without permission would put the landlord in breach of a statutory obligation, such as in the case of listed buildings. We are proposing to exempt landlords where they have attempted to obtain permission to carry
out the works and been refused. Do you think it would be appropriate for this exemption to the Decent Homes Standard to be set out in legislation?

No, this should not be an exemption. We note that the Decent Homes Standard may conflict with listed buildings legislation. It may be appropriate to exempt landlords where they would be breaking a law whichever action they took. The government should review listed buildings legislation at the earliest opportunity to reconcile it with the Decent Homes Standard as much as possible.

22. Do you think local councils should have the discretion to temporarily exempt a landlord from the duty to meet the Decent Homes Standard where the landlord has bought a property with sitting tenants that does not meet the Standard?

No, this should not be an exemption.

However, in acknowledgement of the fact that the landlord could only commence works to improve the property to the Decent Homes Standard after the sale is complete, the council should have discretion to agree with the landlord a timetable of works that would stave off enforcement for a reasonable period to allow the landlord to comply.

23. Do you think local councils should have the discretion to temporarily exempt the personal representatives of a landlord from meeting the Decent Homes Standard where a letting property is under probate?

No, this exemption should be set out in legislation.

Unlike a landlord who is consciously buying a property, the personal representatives of a landlord whose property is subject to probate would be under an obligation to meet the Decent Homes Standard in a very abrupt manner, often in difficult personal circumstances. As such, there is a reasonable basis for this to be an exemption set out in legislation rather than relying on local councils to get involved and make a decision. The exemption should be time-limited and the tenants should expect appropriate improvements to be made within a reasonable timeframe before enforcement action takes place.

24. Do you think local councils should have the discretion to temporarily exempt an incoming manager from the duty to meet the Decent Homes Standard where a landlord has either lost their HMO licence or is not fit and proper, so a new company or person is managing the property?

No, this should not be an exemption.

For the same reason that a new landlord will be taking on a property, new managers should be fully prepared to begin making arrangements to improve a property under their management to meet the Decent Homes Standard. The council should therefore agree a timetable of works to be carried out, after which enforcement action would start if necessary.

25. Do you think local councils should have the discretion to temporarily exempt someone from the duty to meet Decent Homes Standard where they are taking over the property on a temporary basis due to the landlord being incapacitated?

No, this exemption should be set out in legislation.

The principle in this case is similar to that of the scenario in question 23. In such a situation, the person taking over the property should be registered on the portal and held accountable in that way.
26. Do you think local councils should have the discretion to temporarily exempt a landlord from the duty to meet the Decent Homes Standard where accidental damages have occurred (e.g. fires, floods, storms, etc.)?

No, this exemption should be set out in legislation.

Given the unexpected nature of this scenario, the same principle affecting the scenarios in Questions 23 and 25 apply.

27. Do you have any further comments on exemptions from the landlord duty to meet the Standard?

There should be a clear time limit on exemptions or stays on enforcement. Most works should be carried out within a month, and major works should be carried out within three months. Where landlords face an obligation for reasons beyond their control, this may merit an exemption for three months.

If the landlord is exempt from meeting the standard, then the lower quality should be reflected in the rent and the tenant should be able to enforce this at the first-tier tribunal. This would require tenants having the right to apply to the tribunal for a market rent assessment without the landlord first issuing a Section 13 notice.

Exemptions should be based on certain criteria – there should be no exemptions from Criterion A, and an exemption from, e.g. Criterion D, because of an inability to get permission should not exempt a landlord from meeting Criteria B and C.

28. Who do you think should be responsible for a Decent Homes Standard failure? Please select one or more responses.

The freeholder of the property or the leaseholder with a lease of more than 21 years - which party is responsible for the relevant criterion of the Decent Homes Standard will depend on the rights and responsibilities as set out in the terms of individual leases.

29. Do you think that landlords should use the Property Portal to register Decent Homes Standard compliance of their properties or record where there is an agreed exemption?

Yes.

In an ideal world all private rented homes would have their compliance independently verified but until we are in that position, it is essential that the portal require landlords to make a declaration about their compliance that tenants and the authorities can hold them accountable for.

Registration of a property’s compliance or exemption would allow the tenant to verify whether their landlord had been truthful or had provided false information.

30. Tenants only: Would you find it helpful to be able to view whether your current or prospective property had been declared Decent Homes Standard compliant by the landlord or whether an exemption was in place?

Yes.

90% of tenants answered “yes” to this question in our survey.

31. Do you think it should be an offence to provide false or misleading information regarding Decent Homes Standard compliance and exemptions?
Yes.

If there is no penalty for lying about the compliance of one’s rental property, then thousands of landlords will falsely declare their compliance and hope that this will be sufficient to deflect complaints by tenants about the quality of the property.

32. Duplicative burdens on landlords at local and national level are undesirable where they can be avoided. We want to work with local councils and other stakeholders to ensure that the transition to a Privately Rented Property Portal is as seamless as possible, including looking at how it can integrate with licensing schemes where practicable. We will also work to streamline requirements for landlords, such as by working with BEIS on synchronising guidance on minimum energy efficiency. It is imperative that the system meets the needs of landlords, tenants, agents and local councils. Please share thoughts on how we can streamline requirements and support compliance.

There is existing data which should be recorded against a property’s unique ID number (UPRN) and then used to populate the record on the Property Portal. This includes Energy Performance Certificate data, which could include a selection of the most useful information, including MEES compliance, estimated bills (assuming that the data is updated every time energy tariffs change) and floor space. The Portal should also verify landlord information with ownership data held on the Land Registry. Systems of gas and electricity safety checks should be digitised so that these records can be accessed by the Portal. All this will reduce the administrative burden for the landlord but provide valuable, verified information for the tenant and authorities. Once the tourist accommodation register has been set up this should also be integrated with the Property Portal so that landlords cannot, say, register a property as a holiday let for tax purposes, but then let it out to tenants.

Tenants must have a substantial incentive to check their landlord’s compliance. Relying on tenants to look up their address on the Portal simply out of curiosity, and then report non-compliance to the council will not result in the mass use of the Portal that is needed to drive compliance.

At present tenants whose landlord needs, but does not have, a licence can apply for a Rent Repayment Order. There is little awareness of this among tenants because just 7% of rental properties are subject to licensing. Under the new system, tenants whose landlord is not registered with the Portal or the Ombudsman should have a similar claim to a rent refund. Because of the universality of the Portal and Ombudsman, this will catalyse awareness among tenants of their landlords’ responsibilities and by extension their other rights as tenants. Because 100% of properties would be affected, awareness of the law would enjoy much more penetration among private renters. This will in turn spur landlords to ensure they are compliant, making it easier for the authorities to root out the remaining bad apples.

33. Do you think local councils should have a duty to investigate complaints of properties that fail to meet the Standard in their area?

Yes.

However, we note that tenants living in properties failing HHSRS/Criterion A will be at greater risk of harm than tenants in other types of non-compliant property. Councils should prioritise action against landlords whose properties fail Criterion A.

34. Should local councils be required to report activity related to addressing properties that fail to meet the Standard in their area?

Yes.
We will not understand how successful the policy is, or how it can be improved, unless we monitor councils’ enforcement of it. We could continue to rely on small NGOs submitting Freedom of Information requests, but it would be much more efficient to require councils to collect and report information relating to their enforcement activity.

Mandatory reporting will also help councils determine whether to seek higher fines based on repeat offences by landlords with properties in more than one local authority area.

35. If local councils were required to report their Decent Homes Standard activity, to whom should they provide the information?

Both their local community and central government.

We envisage “local community” to mean the general public in terms of making the information available online on at least an annual basis.

37. Do you have any further comments on the proposal to put a duty on local councils?

We need more clarity on what tenants can do about a home they occupy that fails the DHS. The White Paper indicated that the Ombudsman would be able to rule on cases of poor conditions, but it remains unclear how a complaint would be adjudicated.

One of the problems with the current system is that councils can take a long time to respond to complaints and inspect properties. If a council inspection were still a prerequisite for a complaint to the Ombudsman, then this could result in long waits for justice. Instead, tenants could make complaints directly, but would need extensive guidance around the Decent Homes Standard to determine whether their home failed it and, if it didn’t, what their landlord’s obligations were.

Clearly there would need to be a triage system to ensure that councils responded appropriately to severe hazards, posing a risk of harm to the tenant’s health, when flagged to the Ombudsman.

38. Do you think Decent Homes Standard failure awareness notices are a useful part of Decent Homes Standard enforcement?

Yes, they are useful.

Where there are circumstances that might warrant a temporary exemption, we believe an awareness notice would be a stronger mechanism to ensure the failures are on the landlord’s radar and compel them to act upon those failures by a certain date.

39. Do you think local councils should have the power to serve Decent Homes Standard improvement notices?

Yes

40. Do you think local councils should have the power to undertake emergency remedial works?

Yes

41. Do you think local councils should have the power to issue Decent Homes Standard failure prohibition orders?

Yes.

42. Should we amend legislation to make it explicit that a landlord does not have a right to attend inspections [by virtue of receiving notice to that effect]?
Yes.

Very often we hear from tenants who have been discouraged from pursuing a complaint through their council because the council insists on notifying the landlord, who then puts pressure on the tenant to retract. Under selective licensing landlords lose this right.

83% of our supporters answered yes to this question in our survey.

43. Do you think that there is a role for other providers (not just the local council) in providing advice to landlords on whether their properties meet the Decent Homes Standard?

Yes.

We don’t think there is anything stopping landlords from seeking advice on meeting the Decent Homes Standard and, indeed, there are better uses of local authorities’ time than helping landlords comply with the law when there are other landlords who are actively flouting it. If there are recognised providers of this type of advice, it should be made possible for tenants to seek their advice as they may be more aware of a property’s potential to fail the Decent Homes Standard.

44. Do you think local councils have a role in providing advice to landlords on pre-emptive work to prevent properties failing to meet the Standard in the near future?

Yes.

It would make sense, where resources allow, for local authorities to undertake work to prevent Decent Homes Standard failures where this might avoid costlier enforcement activity in future. We would be keen to ensure that receiving advice from the council would not in any way absolve the landlord from responsibility if they failed to make their property compliant.

45. Where local councils provide this advice, should they be able to charge for this service?

Yes.

Charging for advice would help councils provide this service while also fulfilling their duties to enforce against actual failures under the Decent Homes Standard. However, we note that the provision of paid advice could create the risk of a conflict of interest, whereby the landlord may avoid accountability if their home is later found to be non-compliant. This relationship between the landlord and council should be managed carefully in this respect.

46. Should the Decent Homes Standard apply to all privately rented accommodation let on a tenancy?

Yes

47. Should the Decent Homes Standard apply to residential temporary accommodation provided by local councils to homeless households?

Yes.

We hear concerns that temporary accommodation is of poor quality and councils do not enforce existing standards because they have a conflict of interest. It is therefore essential that occupiers of temporary accommodation have a non-council avenue for redress, such as the Ombudsman.

48. Should the Decent Homes Standard apply to purpose-built student accommodation (e.g. halls of residence owned by universities or other providers)?

Yes.
Yes

49. Should the Decent Homes Standard apply to property guardians, where empty buildings are temporarily used for accommodation to provide security?

Yes.

We note that many, if not most, buildings occupied by property guardians were not designed to be residential and so may not meet basic standards expected of a home. However, there is no reason why a company that is making good money from the occupiers should not face the same basic obligations as other landlords.

At this point we would also highlight the prevalence, in guardianship arrangements and other houses in multiple occupation, of sham licences to occupy which can mislead tenants as to their true rights. The Property Portal and other guidance for tenants should make clear the circumstances in which licences to occupy are valid and when the occupier is in fact entitled to rights as a tenant. This will help to address one barrier to justice.

50. Should the Decent Homes Standard apply to lodgers, where a tenant lives in the property with the landlord?

Yes.

Anyone making money from renting out residential space, even in their own home, should meet basic minimum standards. There is a strong case to require landlords who take in lodgers to be registered on the Property Portal given their position of power over what might be a vulnerable person living with them. Inappropriate behaviour by live-in landlords has been raised as a concern by some of our supporters who have had bad experiences.

51. Should the Decent Homes Standard apply to non-traditional accommodation such as houseboats or caravans?

Yes, though when we asked our supporters this was the type of property which had least agreement, with 64% believing it should come into scope.

It is likely that many such properties would not pass all elements of the Decent Homes Standard because of their nature, in which case an exemption may be appropriate. But landlords should still seek to comply with all criteria as far as possible, and any failings should be formally reflected in the rent.

52. Should the Decent Homes Standard apply to ‘tied’ accommodation, which is where an individual is required to or has the option to live in certain accommodation for the purpose of their employment?

Yes

53. Should the Decent Homes Standard apply to farm business tenancies and agricultural holdings?

Yes

54. Do you have any other comments on the scope of the Decent Homes Standard, including other types of accommodation that you think should or should not be included in scope?

No
55. What do you think will be the main impacts from bringing in a Decent Homes Standard in the private rented sector for both tenants and landlords? Please provide any evidence and further comments on impacts in the free text box.

We set out the likely impacts below with our comments.

*Improved health and wellbeing for tenants*

Tenants will enjoy a comfortable home, with a lower risk of developing physical and mental health problems as a result of their home. As well as health problems, less mould and disrepair will reduce damage to tenants’ property. Tenants will know that they will get value for money from their rent.

*Increase in tenants’ pride in their home*

For people living in poor quality homes, the basic act of inviting a friend over for a cup of tea is out of the question. These renters are having basic quality of life impeded because their landlords are not compelled to provide a decent standard of accommodation.

*Fairer competition in the rental market:*

Private landlords letting to people relying on benefits will no longer be able to profit by undercutting the social sectors.

*Increased rents*

The way rents are regulated – and are proposed to be regulated – with the first-tier tribunal making market rent assessments, taking into account the quality of the property, there is a clear mechanism whereby the improvement of a property to the Decent Homes Standard will see the rent on that property increase. For example, a landlord who sought a rent increase via a Section 13 notice on a property that failed the Standard, might be awarded a £600 per month rent by the tribunal. If they made improvements, and then sought a rent increase, the tribunal might award a rent of £800 per month. In this way, a tenant who would not be able to afford the higher rent may be dissuaded from requesting improvements if it simply resulted in the landlord complying then being rewarded with a rent increase that priced the tenant out of the property. It is therefore essential that there is sufficient and clear incentive for a tenant to exercise their rights, either to formally challenge the rent if they think that it does not reflect the quality of the property, or to claim a rent repayment order if the home fails to meet the Standard. The government should also make sure that Local Housing Allowance is responsive to improvements in quality – particularly given that tenants in non-decent homes are more likely to be receiving housing support.

*Disruption for tenants whilst works are being undertaken*

Many improvements will be able to be made without disrupting tenants’ lives and enjoyment of their property. However, major works may be so intrusive that they require the tenant to stay somewhere else temporarily. Wherever possible the landlord should pay for alternative accommodation for the tenant if they cannot occupy the property for the time it takes for works to be completed.

*Financial cost for landlords to make changes*

There will clearly be a cost in many cases for a landlord to bring a property up to the Decent Homes Standard. However, this should not be viewed as an impact as such. Landlords should already be setting rental income aside to pay for maintenance as a matter of course. The Decent Homes Standard would simply enforce this. It may also encourage landlords to be more conservative in their...
investment decisions. The lack of a Decent Homes Standard may have encouraged landlords to bid more for a property based on its expected yield than they should have, because there was no compulsion to meet a minimum standard, and therefore lower expected costs.

56. There are risks that bringing in the Decent Homes Standard means landlords exit the market or that they pass costs on to tenants. Which of the below would you support to mitigate the risks of any negative impacts of introducing a Decent Homes Standard in the private rented sector? Choose as many as you would like.

Other: a programme of public sector and third sector organisations purchasing and improving homes that are being sold by private landlords, with homes where tenants are threatened with eviction prioritised.

If landlords exit the market it is unlikely that this would lead to higher rents overall as it would result in a corresponding shift of private renters into home ownership. A fall in supply of PRS homes would be matched by a fall in demand for PRS homes, making no difference to rents.

Our main concerns are where tenants face eviction as a result of new obligations on their landlord. Where possible tenants should remain in their homes, which means landlords who feel unable to improve the properties themselves should sell with sitting tenants.

This may require changes to mortgage lending rules to encourage such sales. If the market cannot rise to the challenge, local authorities, housing associations and other types of not-for-profit owner such as co-operatives should be equipped to intervene. This may require a fund if there is insufficient capital available at present.

It may be more viable for local authorities to intervene where landlords have been fined under housing legislation but have not paid up. Charges against the property mean that the council could compulsorily purchase the offending property at low cost and then make the changes itself.

Landlords may also evict tenants to make refurbishments and then re-let the property at a higher rent. To mitigate this (and the risk of landlords selling up), there could be a grants system means-tested based on the tenant’s financial situation, which would provide funds to upgrade the property on the condition that the rent is not increased to reflect the higher value of the property, and that the landlord does not evict the tenant to sell for at least five years.

57. To what extent would you support bringing in a cost cap on criteria B, C and D of the Standard (e.g. on the non-safety elements of the Standard)?

Strongly unsupportive.

Every renter should expect the same minimum standard. Giving landlords an exemption because they have already spent a certain amount of money would arbitrarily disadvantage their tenants.

A cap may encourage fraudulent behaviour whereby a landlord asks their contractors to exaggerate the cost of works to bring them to the cap quicker.

The prospect of a cap in several years’ time may also discourage landlords from making improvements now if their investment would not count towards the cap once it was in force.

58. Do you think there should be a transitional ‘grace’ period before the Decent Homes Standard becomes a requirement, and when enforcement action can be taken?

No, there should be no grace period
59. If there were to be a grace period, what length of grace period should there be before the Decent Homes Standard becomes a requirement?

There should not be a grace period.

60. Do you think that we should phase in parts of the Standard. For example, to bring in criteria A and B in the first instance, before including criteria C and D at a future point?

No, all elements of the Standard should come in at the same time.

We would like all elements of the standard to come in as soon as possible. However, we note that criteria C and D are more likely to involve major works which may be more appropriate taking place between tenancies. The principle suggested in the 2020 consultation on Minimum Energy Efficiency Standards, whereby new tenancies must be compliant three years before the cut off for all tenancies, may be appropriate. It would also make sense to us that thermal comfort measures be aligned with new MEES given that encouraging landlords to retrofit properties in one go would be most productive.

61. If elements of the Standard were to be phased in, please rank the order you would want them to be brought in from first to last.

First: Criterion A: It meets the current statutory minimum standard for housing
Second: Criterion B: It is in a reasonable state of repair
Third: Criterion C: It has reasonable facilities and services
Fourth: Criterion D: It has a reasonable degree of thermal comfort

The most important is Criterion A as that is effectively the law already and there should be no grace period whatsoever.

Criterion D will be closely associated with the Minimum Energy Efficiency Standards, so it would make sense for this to be aligned.

62. If elements of the Standard were to be phased in, how long would you like to see between phases?

There should not be any phasing.