

## Ofgem ECO4 scoring consultation response – Happy Energy Solutions Ltd

### 2. Overarching approach to ECO4 scoring

**Question 1:** Do you agree with our proposed format for partial project and full project scores? Please provide reasons for your answer, and if applicable alternative suggestions with justification including as much detail and evidence as possible.

Yes

**Question 2:** Do you agree with our proposal to include fixed value uplifts into our scoring matrix and for fixed value uplifts to be notified as measures? If not, please indicate your preferred alternative.

Yes

### 3. Determining the finishing SAP rating

**Question 3:** Do you agree with our proposal to require a post-retrofit RdSAP assessment to determine a project's finishing SAP rating (option 1)? Responses will be considered alongside those received on this topic during part 1 of our scoring consultation.

We would prefer a scoring tool to be used, whereby the baseline EPC input data is used to calculate the savings, even if a post lodged EPC is also required as part of the process. If not, there will be issues with a second EPC having slightly different input data, either due to a different DEA completing the survey, 'gaming', or due to other non-ECO works having been completed in the interim period, this could be something as simple as new low energy bulbs, through to the changing of the meter from a dual tariff, to a single tariff, when storage heaters are removed and replaced with a heat pump. It will also add cost and burden in checking whether the EPC input data is identical from the pre to the post EPC and if there is a difference due to two different DEAs completing the surveys, there will be no way to force the second DEA to match the input data from the pre EPC, as each will have their own interpretation of the property.

In all cases we believe data should be based on lodged and quality assured EPC data, not just RdSAP and not full SAP.

### 4. Notification in ECO4

**Question 4:** Do you agree with separate measure and project notifications? If not, would you prefer a single notification? Please suggest any pros and cons to either approach that have not been included above.

Yes

**Question 5:** Do you agree with our proposal to award deflated PPS to the final measure in a project? If not, please suggest an alternative.

The risk of a potential future reduction of a FPS to a number of PPSs may lead to energy suppliers putting in place large and long retentions. Careful consideration also needs to be given to how a supplier may treat multiple contractors who have separately submitted works into the same upgrade package. So if for example installer 1 and installer 2 had separately contributed to a package of works and supplier 1 had a failure in their measure, the entire package would revert back to PPSs, unfairly penalising measures that had been properly installed. Surely the fair approach is to only make a reduction of the FPS based on the

individual failed measure, therefore only impacting the installer of that measure, rather than reducing all measures back to their PSSs?

**Question 6:** Do you agree that in ECO4 we should continue to require supplier generated MRNs to for all measures? If not, please propose any alternative options.

No comment

**Question 7:** Do you agree with our proposals for determining the point of completion for the project? Can you suggest any alternatives to determine that a project has been completed?

Yes

## 5. Updates to existing ECO measures

**Question 8:** Do you agree with the assumptions used to develop the partial project scores? If not, please suggest where the assumptions should be changed.

Yes

**Question 9:** What are your views on our proposal to remove the wall type distinction for heating measures?

This seems reasonable

**Question 10:** Do you agree with our proposal to split the standard heating control measure into a programmer and room thermostat measure and a TRV measure?

The rules for heating controls in ECO3 were always flawed in our opinion, the ability to claim a full heating control upgrade by adding just one TRV to create a full set of controls seemed nonsensical. Also, the fact that the score for a heating measure, where the property already had a pre-existing set of heating controls, was about the same as claiming the combined heating upgrade (no PreHC) plus heating control upgrade, meant it was almost pointless having the separation. For a heating upgrade, there may as well just be one score, with the assumption that at the end the heating controls will be full, whether they were to begin with or not.

In SAP the savings between the individual heating controls can vary, so we would suggest splitting out the timer from the room thermostat and not bundling them together

**Question 11:** Do you have any suggestions on how heating control measure category could be further simplified?

See above re heating measures

**Question 12:** Do you agree with the proposed changes to the notification of rare heating systems? If not, please provide alternative suggestions.

Yes

**Question 13:** What are your views on our proposal to remove pre-main heat source for insulation measures?

We believe that this will be beneficial, minimising gaming and encouraging the push to attain the FPS, rather than profiteering on a high PPS for an off gas insulation measure

**Question 14:** Do you agree that the number of u-value variants for solid wall insulation measures should be reduced? If not, please provide alternative suggestions.

Yes and they could be reduced even further by setting a minimum post u-value of 0.3

**Question 15:** What are your views on our proposal to have a combined park home insulation measure?

The IAA have agreed with Trustmark that individual elements can be insulated on a park home and still remain compliant with PAS2035, so the removal of the individual measures would make it impossible to deliver measures in this way. There may also be situations where one of the elements of the park home are already insulated and only one or two elements require an upgrade, so the three individual scores should be maintained

**Question 16:** Do you agree with our proposal to retain the distinction between single and double park homes by creating a "PHI single" and "PHI double" measure?

Yes – either a single double, or a move to a number of bedrooms to be more in line with other measures

## 6. New measures added for ECO4

**Question 17:** What are your views on the addition of partial project scores for pitched roof insulation, hybrid wall insulation and district heating system connection measures?

This seems sensible

**Question 18:** Do you agree with the approach and assumptions used to derive the scores for the pitched roof insulation measure? If not, please provide alternative suggestions.

We have commonly found that a pitched roof has no insulation in it, unless it was built in more recent times where building regulation required it to be insulated. So it would seem sensible to have a pre and post-date with different starting u-values, perhaps pre and post 1982?

**Question 19:** Do you agree with the approach and assumptions used to derive the scores for the district heating system connection measure? If not, please provide alternative suggestions.

Yes