Energy Company Obligation (ECO) consultation: Updating Deemed Scores for ECO3 Questions

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Background

The questions below relate to the consultation seeking views on our approach to updating the deemed scores for ECO3, should it be introduced as set out in the Government consultation. The consultation can be found on our website.

This consultation is open for six weeks from 4 April to 16 May 2018.

Notes For Completion

Please complete all relevant sections of the document by selecting an answer for the question and then providing reasons/evidence for your response in the box provided. The questionnaire should be completed in typeface and returned via email to eco.consultation@ofgem.gov.uk by **close of business on Wednesday 16th May 2018**.

1. Respondent Details

Organisation Name:	Tighean Innse Gall
Organisation type:	Installer -third sector
Completed By:	S.Wilson
Contact Details:	01851 706121

1. Updates related to RdSAP and Fuel Prices

Q1. Do you agree with our proposal to apply the RdSAP v9.93 updates across all wall types which currently use a pre-installation U-value of 2.1 W/m²K?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer and include as much detail and evidence as possible.

The basis upon which the decision has been take is according to section 1.5 of the consultation that there are relatively few of the wall types.

However in rural scotland this wall type is prevalent and the in the island locations particularly so. See e.g. https://www.cne-siar.gov.uk/media/10328/appendix-4-lhs-executive-report-of-survey-november-2016.pdf section 2.5 approx 30% of the stock falls into this category

Thus the apporach proposed will impact the rural areas, with the highest fuel poverty levels, by reducing funding for the households most in need with HTT wall types which require the measures. Thus the BRE broad brush one size fits all approach discriminates against those in deepest fuel poverty by defining their wall type away thereby impacting the effective delivery of the most needed measures in logistical areas where costs are highest.

Q2. Do you agree with our proposal to use the most up to date fuel prices available from the Product Characteristic Database (PCDB) for the deemed scores throughout ECO3?

- ○ Strongly Agree
- ○ Agree
- ◉ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ○ N/A

Please provide reasons for your answer and include as much detail and evidence as possible.

2. Proposed Alternative to Percentage of Property Treated

Q3. Do you agree with our proposed approach to removing POPT for the majority of measures by identifying average treatable areas and adjusting the scores accordingly?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable provide an alternative approach including as much detail and evidence as possible.

Whilst the motivation for the removal of POPT is a welcome response to the industry's position on the difficulty of operating POPT, the proposal will not in fact achieve its removal. Utility partners will inevitably demand evidence that the percentage treated is above the minima and therefore will retain the requirement for the POPT recording methodology. This was acknowleged as the case by utilities represented at the Glasgow consultation event. It is also acknowledged in the consultation
Thus it would seem to defeat the purpose of simplifying the system if to change tack for ECO3 in reality means the utilities will still effectively require the evidence under ECO2t -and any new requirement.

Q4. Do you agree with our use of English Housing Survey data to identify average treatable areas for SWI, CWI, loft insulation, flat roof insulation and underfloor insulation?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable suggest an alternative source of data with justification including as much detail and evidence as possible.

Rural Scotland house types are not well represented by EHC data. Use at least SHC data sets.

Q5. Do you agree with our use of English Follow up Survey data to identify average treatable areas for heating measures?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ◉ N/A

Please provide reasons for your answer, and if applicable suggest an alternative source of data with justification including as much detail and evidence as possible.

Q6. Do you agree with our use of Ofgem data and industry opinion to identify average treatable areas for RIRI and park home insulation measures?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable an alternative approach with justification including as much detail and evidence as possible.

See answer to Q3.

Q7. Do you agree with our proposed approach for measures for which there is insufficient data available to identify treatable areas?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable suggest an alternative source of data with justification including as much detail and evidence as possible.

Q8. Do you agree with our minimum requirement that at least 67% of the property is treated in order to qualify for the full ECO3 deemed score?

- ○ Strongly Agree
- ◉ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable an alternative approach including as much detail and evidence as possible.

As long as 2.33 of the consultation is honoured. This allows homes with a Room in Roof but also has extensions of different construction types, to receive a RnR measure

Q9. Do you agree with our proposed approach of using POPT to score measures which do not meet the 67% minimum requirement?

- (●) Strongly Agree
- ( ) Agree
- ( ) Neither Agree Nor Disagree
- ( ) Disagree
- ( ) Strongly Disagree
- ( ) N/A

Please provide reasons for your answer, and if applicable an alternative approach including as much detail and evidence as possible.

see answer to Q8 above

3. Updates to the format of deemed scores

Q10. Do you agree with our proposed format for deemed scores?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable alternative suggestions with justification including as much detail and evidence as possible.

We disagree with the removal of uplifts and in particular given the proposals relating to Solid wall uvalues and RnR uvalue/stock age profile. Together these will significantly impact delivery in the remote rural areas and make it very difficult to deliver these measures to households with the deepest fuel poverty.
OFGEM must relay to BEIS the case for retaining a Rural uplift if these proposed changes remain unaltered. Failure to retain the uplift will result in the rural stock being underscored simply for being rural. Retaining an uplift for Remote rural areas as defined by Scottish Government can be an effective way to mitigate the impact of using a broad brush approach to uvalues and age profile of the stock.

4. Updates to Room-in-Roof Insulation Scores

Q11. Do you agree with our proposal to update the assumed size of the floor area of the room-in-roof used to develop the RIRI score?

- ○ Strongly Agree
- ◉ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable please suggest an alternative approach including as much detail and evidence as possible.

Q12. Do you agree with our proposal relating to the assumed levels of insulation in the elements of the room-in-roof used to develop the RIRI score?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ◉ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, and if applicable an alternative approach including as much detail and evidence as possible.

Section 4.11-4.13 of the consultation again relies on the BRE's broad brussh approach to scoring and ignores the data sets which ofgem will have access to from claimed returns. In Rural scotland and in particular the island areas the distribution of age of the stock to be insulated is in no way represented by table 5. In the outer hebrides the pre 1966 age band will account for between 70-80% of the house types receiving measures and the remainging measures will be to 1966-1975 bands, not 35%/8% respectively as proposed in the table.
The result will be a significant downgrading of savings from the island rural house types and again will discriminate directly against those in most need of measures in the most fuel poor areas with the highest logistic costs for delivery. With utility permissions we will glady share our return data to utilities to justify the position if OFGEM is not currently able to reasily acess this data.

5. Updates to scores for heating measures

Q13. With regard to upgrades for inefficient mains-gas and LPG boilers, do you agree with the assumptions we have used to identify the pre-installation efficiency for non-condensing boilers?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ○ N/A

Please provide reasons for your answer, including as much detail and evidence as possible.

Q14. Ofgem are responsible for determining what constitutes a similar efficiency rating to non-condensing boilers and for electric storage heating with a responsiveness rating of 0.2 or less. We are in the initial stages of developing our position on this area and we welcome views from stakeholders. In responding you may have regard to the following non-exhaustive examples of issues to consider;

(i) A methodology for determining this rating for each heating type
(ii) Data sources that we could use

Please provide reasons for your answer, including as much detail and evidence as possible.

6. Updates to scores for Park Home insulation measures

Q15. Do you agree with the proposed update to the park home insulation deemed scores?

- ○ Strongly Agree
- ○ Agree
- ○ Neither Agree Nor Disagree
- ○ Disagree
- ○ Strongly Disagree
- ◉ N/A

Please provide reasons for your answer, including as much detail and evidence as possible.

7. Invitation to Provide General Comments

Q16. We are also interested in high-level and material issues which are relevant to and likely to have a substantive impact on our approach to improving deemed scores for ECO3, for example, you may have views on:

(i) How could we streamline our administrative processes to further the main objectives of the deemed scores;
(ii) How could we amend the underlying assumptions or methodology to improve the deemed scores.

Please provide as much evidence and detail as possible in your response.