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:	Mauer (UK) Limited
Organisation type:	Manufacturer
Completed By:	Daniel Jay
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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.

I am familiar that there are many solid walled properties that perform to an improved U-Value than the 2.1 historically used, however there are a number of clear issues when applying a reduced U-Value as a generic across solid walls.

Firstly, and extremely importantly, it is already understood that gas boiler central heating systems are oversized in the UK by a factor of 1.8 (further evidence can be provided to support my statement on request). We understand that there is a change within RdSAP v9.93 to the U-Value, however, there is no apparent change to the guidelines for boiler sizing. We understand that c. 1.6million boilers are replaced every year in the UK and this imbalance in envelope performance criteria across two key UK standards is a clear admission that BEIS and Ofgem are acknowledging the fact that they are allowing (knowingly) the oversized installation thousands of boilers

We acknowledge that research has been performed to establish what solid walls currently perform at, but it is extremely difficult for even real life performance assessments to achieve true U-Value since there is such variance in thermal bridging within a solid brick wall construction across the total area of a wall. We have seen that slight consideration has been made towards brick tie bridging, moisture in the brick etc, but I believe the research is nearly impossible to standardise into a single standard U-Value. Another hugely important factor to be considered in the thermal performance of walls is the effect of wind on pushing cold air through the wall construction and pulling warm air out.

I agree that a better understanding of wall performance is an important topic to address, but the complexities do not allow, let alone justify the use of a simple U-Value applied to every property of some extremely basic sub categories (ie. system build pre 1967, solid brick as built pre 1967).

Conventions for U-Value assessment are standardised throughout Europe, and this change implies that we are actually not generting as much carbon from solid wall properties as assumed. it is an understood fact that a larger % of people in fuel poverty live in solid walled properties, and to change this U-Value simply improves the national performance of these properties (in the eyes of the EPC) without actually assisting the occupants who are in need, which is morally wrong. the change in U-Value will make it even more difficult to cost an improvement to the property and assist the occupant to get out of fuel poverty.

Our position, in summary is, a change to U-Value assessment needs to be more thoroughly assessed. For solid Brick properties, keep the sub category of 'dry-lined' (1.55 U-Value), and 'not dry lined' (2.1 U-Value) and create further deemed score sub categories accordingly. To standardise Solid wall into the simplified categories that exist inhibits many people in property types (such as mid terraced solid

brick) from attracting any type of support from ECO3. This property type (as the example) is ultmately the volume type of property that akes the foundations of any town or city, with many people owning their properties, but in fuel poverty. BEIS and OFGEM CANNOT allow a model to be approved that knowingly does not provide a balance of support for such a large population of target audience (people in fuel poverty).

16.5.18 - Regarding the announcement from the Prime Minister today allocating £400million of Government funds to strip and re-clad tower blocks following the horrific Grenfell Disaster, if Social Housing providers are to receive this funding, then should the properties be re-clad with EWI, they should not be eligible for ECO3 funding or banking, and cannot fall back to an D/E/F/G starting point. I make this point as I know that Energy Providers and elements of the market will try and discharge a large volume of their obligation by using this Government Money, and also have a double benefit by accessing ECO3 funding. THIS WILL BE WHOLLY WRONG, MUST BEIS/OFGEM MUST MAKE A FIRM STANCE ON THIS POSITION.

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.

The suggestion to use Dec 2017 fuel price data across the entire ECO3 scheme is ludicrous. The BRE suggestion that by updating fuel prices at intervals will have minimal impact on scores, provides ZERO consideration for the impact of fuel price increase on occupants in fuel poverty. when the deemed scores are so limited, and the energy providers finding every way possible to discharge their obligations in the most cost effective way, the obligation is already set up in such a way that for much needed measures (such as solid wall insulation) every little bit of funding opportunity will help. I do not believe that BRE or BEIS or OFGEM can openly say that fuel prices to occupants will be fixed for the next 3 years, or that any increase on fuel price to these people in fuel poverty will have 'minimal impact' on their lives. there MUST be a clear reflection from ECO3 regarding fuel prices in line with increases in fuel prices from the Energy providers. We have already seen price increases introduced by some Energy Providers since Dec 2017.

Summary: 2 Options are available to consider:

Option 1: Deemed Scores must be updated every 6 months to reflect fuel prices in the market.
Option 2: Keep Deemed scores statics, but monitor Energy providers price increases, and increase the annual obligation value (£640m, and required carbon/LTS obligation size) by the same % increase as that of the price increase. Without doing this, Energy Providers are generating more money without

any direct impact, which actually means they are knowingly spending less than the £640m annual spend on energy saving measures, and BEIS/OFGEM are allowing them to do this.

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.

It is a huge worry that there are many people of authority in this industry who are unable to calculate a very simple POPT requirement. The administration burden again is quite frankly pathetic too. Essentially all measure must be PAS compliant, and as part of that process, a survey must be carried out on the property. The data required for POPT is held within the PAS survey data.

It is blindingly obvious that particular stakeholders have been lobbying louder than others.

the fundamenta issue around POPT is that simplifaction of the deemed scores which have been in place since ECO2T. When deemed scores for ECO2t were in consulation, we reviewed the BRE methodology for generation of the deemed scores, so that we could gain a thorough understanding of how they were generated. It came as no surprise that within the BRE methodology document there were a few critical elements of information that were not in the document to allow us to reverse engineer the Deemed scores to establish the type of property characteristics were considered for a particular property.

We finally received the specific formulae from Ofgem after the Eco2t consultation had closed, but which time we were told we were too late. In summary our reason for understanding deemed scores in detail was below:

-Properties may have 2 bedroom, but be much larger in size than others. Heating bills are generated by the amount of energy used to heat a space by volume, not by the number of bedrooms, so if you live in a property built at the turn of the century, with high ceilings, larger external wall area, but still only 2 bedrooms, the boiler will have to be on longer to heat that volume of space.
-We wanted to reverse engineer the deemed scores to understand what net wall areas were being assumed by the deemed score calculation, and understand how accurate they were across real properties net wall areas.
-Many measures are priced in the market based on a £/M2 install rate. SO, you may have 2x 2 bedroomed mid terraced houses, both in fuel poverty, both with 100% solid walls, but they have different layouts, so there is a variance in the heat loss wall areas. One of these properties may cost £6000 to recive SWI, and the other may cost £8500, yet the deemed score remains static on both properties, so poor Mrs. Miggins living in the larger home will not even be considered by Energy Providers as a target to help because the carbon yield is not relative to the spend.
- I forget the exact Nett wall area assumed by the deemed scores (once we had the formulae from OFGEM), but i can provide our findings upon request. From memory, I believe a 2 bed M/T solid brick property had a Net Wall Area of around 45m2.

_ We provided OFGEM with our evidential findings, as we laser scan every property, and proved that there were hundreds of thousands of mid terraced 2 bed properties which had Net wall areas nearer to a 3 bed End Terraced deemed score assumed nett wall area. We were informed that the consultation was closed and that we would have to wait until the next opportunity to highlight this issue. That time is now.

Some of the deemed scores were found to be very accurate regarding Nett Wall area, such as End Terraced and Semi-Detached. Some deemed scores assumed larger wall areas than were in reality, such as flats (which will be why you have probbly seem a great many flats being banked through Eco2t for solid wall), as opposed to mid terraced properties.

The commercial market (Energy Providers, Managing agents, and some installers) will always target the commercially easier wins, and the Deemed Score format simply assists them in targeting them, and blatently provides them with a way to ignore a huge proportion of the properties in fuel poverty.

To bring balance to provide all properties within fuel poverty with equal opportunity to receive funding, the full characteristic of the deemed score must be released to the market, which clearly shows exactly what the Nett Wall Area is within the deemed score. Then, based on that figure, the POPT and POMI should reflect the % of measure installed and property treated against the deemed score nett wall area. SO, if a 2 bed mid terraced property solid wall property has a nett wall area of 90m2, and the deemed score nett wall area is 45m2, then if the entire external envelope is insulated, then the POPT should be 200%, and the score for banking should reflect that, since as mentioned before, the boiler is working to heat the volume of the property, and the external envelope has too much variance to simply be set at a typical archetype.

unless this is accepted and implemented, then the energy providers and other lobbying bodies, will continue to request that you allow social housing providers (with money) with band D properties eligibility under ECO3, and the private owners, on benefits and in fuel poverty will continue to be ignored.

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.

The same reasons apply as those in answer Q3. PAS required documentation provides more than enough evidence for a property specific approach that utilises the deemed score model (with released nett wall area details - the figures used to derive the deemed scores by property type) and then continues POPT and POMI. The introduction of English Housing Survey Data for average

treatable areas, gives the impression of simplification, but in fact will have a massive knock on cost effective delivery as it will eliminate so many properties from commercial viability and make it harder for utilities to find suitable properties, which is no wonder they are asking for band D in social housing to be eligible.

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.

Same principles apply as answered in Q1, Q2, Q3 and Q4. Every building is different.

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.

Refer to all previous answers. We observed in ECO2t where installers were installing RIRI in a bedroom, but not in the landing. We found that to be completely stupid as the heat will simply escape through the uninsulated area, where heat in the stairwell from all floors goes to this uninsulated area. the term RIRI is correct, but people are using it as 'BedroomIRI' this is wrong. Again this is a clear example where BEIS/OFGEM have created a format that is open to exploitation, and then when realised, they suggest a clampdown that ultimately affects people that need compentent insulation measures installed and by competent installers.

These 'knee jerk' changes to the ECO3 format that are in consultation are ultimately realising that the industry are very strategic and commercial without any consideration to the occupants. These changes will have a detrimental effect on the industry and occupants as a whole.

OFGEM/BEIS should continue with the POPT/POMI format from ECO2t, apply my suggestions in answer to Q3 (as the same principles aaply to Nett Wall areas as roof areas - BRE MUST release this information - we have it, so we could release it to the market, but i'm sure BRE would not like us to do that as it could severly expose them to further questioning in this volatile time), and impose strict penalties on Energy Providers should they allow their supply chains to not comply with the fundamental principles of the obligation, which is to reduce energy consumption in properties and enable people to get out of fuel poverty.

For too long BEIS/OFGEM have been too soft on the industry. Rewards should be there for those who perform to the fundamental principles of reducing carbon for those in need, and punishment for those who abuse the priveledge of working in this arena. BEIS/OFGEM need to force out those who abuse.

A firm stance must be taken by BEIS/OFGEM

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.

Please refer to previous answers (Q1-Q6). i do not accept that there is insufficient data available at any point in ECO.

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.

I agree there needs to be a minimum, however the % should be higher that 67% regarding insulation. Bad analagy time - you would not fit 75% of wheels on a car and say that is great, and justify a full benefit as a reward, would you? It is the same principle for insulation. leaving areas exposed, creates a path for heat to escape. How is it possible for BEIS/OFGEM to accept this!?! The Original Greendeal had something similar where the figure was 50%, and what a surprise, only the front elevation was treated with SWI, so all the heat escaped out the rear.

I truly fear that BEIS/OFGEM believe that everyone in this industry is a saint. if you keep this figure at 67% then i guarantee that you will see properties that only have 2 out of the 3 available walls insulated to keep the costs of install down.

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.

Refer to simple format suggested in Q3 and Q8 responses.

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 have accepted the principles of Deemed scores, but they have standardised too severely as explained in all previous question answers in this consultation. During ECO2t and since the release of ECO3 consultation we have spoken to a great many local authorities throughout the the UK and they ALL acknowledge that a great many people in fuel poverty have gas central heating. The fact that BEIS/OFGEM have introduced disparetly in the multiplier (by keeping Gas heated at a uplift multiplier of 1, and electric heating etc at an uplift multiplier of 1.35 will result in the industry again strategically ignoring the majority % of people in fuel poverty, which is completely counter intuitive. These people in fuel poverty will not go away, they will still be there in future, as they are still there after the Dec 2013 autumn statement which resulted in the significant change to ECO1 and effectively took away the solid wall objective of ECO1 by introducing the SWI minima and allowing std cavities back in and open to abuse by cowboys (how many CWI installs are apparent at the moment).

Effectiveness energy performance of a property is based on a holistic approach to improving a property. the current deemed score format considers measures as a single item. there is zero considertion about the actual inflated benefits of multiple measures when they are calibrated and work together is designed unison. in mainland Europe there are examples of how multiple measures on a property have significant improvements (some up to 74% energy improvement on retrofit residential properties - EU reports avilable from me on request). The holistic approach works, but the deemed score format does not incentivise. We at Mauer have a designed approach which allows all measures to be callibrated together to work efficiently together. It must be recognised (through a multimeasure multiplier applied of deemed scores for such installations) Our approach is innovative and can be simply monitored and we would like to discuss it with BEIS and OFGEM.

Boilers - Continuing with a cap on boilers. I have expressed our concern about the abuse of boilers in our ECO3 consultation response, but in relevance to the deemed scores, we find it impossible to understand the assumption of 10 - 12 years of electric usage in previous obligations, or even the 3 years as suggested in this consultation as the format for LTS yield on replacement boilers. We refuse to accept that replacement boilers have not been open to huge abuse by a great many stateholders within ECO. The scheme control mechanisms of the past have made it so easy for installers and providers to clear a great amount of their obligation through this route (120000 boiler replacements a year!?!) If a boiler has genuinely broken, there must be clear evidence made available to justify the replacement through the ECO route. It is highly likely that all property owners/landlords are on a boiler plan (service/insurance etc) that the replacement would likely be covered. Is this ever checked?we have also noted that when the boiler replacements are done, there historically has been a simple 'like for like' boiler change. Where is the carbon saving in this approach? Where is the evidence that they have been heating the property using electric heating for years? This screams of

an industry that wants to limit impact on themselves, and ensure that the result of the measure has not detrimental effect on their gas sales. If the property has not been using gas for some time, then the energy provider MUST provide evidence from factual meter readings to support the claim. They must prove that the property does not have boiler breakdown cover etc. They must also ensure that the appropriate boiler is installed. For example, the property may have had fabric improvements since the last boiler installation. If that is the case, then the radiators are oversized, boiler oversized etc, so a replacement boiler is the ideal opportunity to resize all heating requirements.

Energy providers will say that this approach will create more admin, but quite frankly, this admin must be considered as a form of probationary action due to the amount of abuse seen over previous years. If things are done fair, proper and right in the first place, then an understanding of quality and trust is created and necessary admin can be reduced. Until elements of the industry recognize this, then admin and evidence must remain.

In summary, there will be a need to replace boilers, but the mechanism is too open to abuse. Capping at 35,000 still means that 35,000 occupants are at risk of gaining nothing, and ultimately BEIS gaining nothing in their strive for saving energy and money saving for people in fuel poverty.

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.

Approach suggested in Q3, Q4 and Q8 can be applied to the room in roof sizing, based on BRE releasing the necessary calculation information to the market (or we can if you wish).

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.

This is insane - The objective of the obligation is to improve properties of people in fuel poverty and in need of making heating there homes more affordable and save carbon. From a review of insulation levels in RIRI the suggestion of a weighted average U-Value of 1.14 is ridiculous. The table shows 36% of total RIRI and U-Value is post 1996. Why would you even consider them in generating a weighted average U-Value? The target people that need help in this measure are those with the 2.3 U-Value roof. BEIS/OFGM MUST Restrict the measure from being installed in any property newer that 1966. simple. IF BEIS/OFGEM do not introduc this restriction, then the industry will simply install a layer of foam wallpaper into a property built in 2006 and claim the yield based on the 1.14 U-Value. Who Benefits!?! the occupant will see no difference, and will probably have to contribute some money,

BEIS/OFGEM will not realise any carbon saving, and the most important fact is THE PEOPLE IN NEED WILL NOT EVEN BE CONSIDERED, AS IT IS FAR CHEAPER TO INSTALL A LAYER OF FOAM WALL PAPER THAN ACTUALLY DO THE APPROPRIATE INSTALL ON THE APPROPRIATE PROPERTY IN NEED.

THIS WEIGHTED AVERAGE U-VALUE IS A COMPLETELY UNACCEPTABLE SUGGESTION FROM BEIS/OFGEM AND PUTS REAL FEAR INTO ME AS TO WHO IS GENERATING SUCH FARCICAL APPROACHES AND SUGGESTING THEM IN THIS CONSULTATION.

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.

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Boilers - Continuing with a cap on boilers. I have expressed our concern about the abuse of boilers in our ECO3 consultation response, but in relevance to the deemed scores, we find it impossible to understand the assumption of 10 - 12 years of electric usage in previous obligations, or even the 3 years as suggested in this consultation as the format for LTS yield on replacement boilers. We refuse to accept that replacement boilers have not been open to huge abuse by a great many stateholders within ECO. The scheme control mechanisms of the past have made it so easy for installers and providers to clear a great amount of their obligation through this route (120000 boiler replacements a year!?!) If a boiler has genuinely broken, there must be clear evidence made available to justify the replacement through the ECO route. It is highly likely that all property owners/landlords are on a boiler plan (service/insurance etc) that the replacement would likely be covered. Is this ever checked?we have also noted that when the boiler replacements are done, there historically has been a simple 'like for like' boiler change. Where is the carbon saving in this approach? Where is the evidence that they have been heating the property using electric heating for years? This screams of an industry that wants to limit impact on themselves, and ensure that the result of the measure has not detrimental effect on their gas sales. If the property has not been using gas for some time, then the energy provider MUST provide evidence from factual meter readings to support the claim. They must prove that the property does not have boiler breakdown cover etc. They must also ensure that the appropriate boiler is installed. For example, the property may have had fabric improvements since the last boiler installation. If that is the case, then the radiators are oversized, boiler oversized etc, so a replacement boiler is the ideal opportunity to resize all heating requirements.

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trust is created and necessary admin can be reduced. Until elements of the industry recognize this, then admin and evidence must remain.

In summary, there will be a need to replace boilers, but the mechanism is too open to abuse. Capping at 35,000 still means that 35,000 occupants are at risk of gaining nothing, and ultimately BEIS gaining nothing in their strive for saving energy and money saving for people in fuel poverty.

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.

No Comment

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.

Park homes are likelt to have not seen any high level of measure installation over previous obligations. That is simply because there are no suitable solutions available in the market that have adaptability to cope with a park home property type. an example would be for the walls - the level of structural stability in a park home wall substrate is so minimal, that our concern would be that the substrate could not cope with the weight of an EWI system. Mauer are developing a solution, however this will take time. floor and roof access may also be difficult, however, there are hundreds of variations to park home design, so solutions almost need to be unique, and a simplified standard score under deemed score is simply not appropriate. Cost/Benefit ratio to invest in energy saving measures to an occupant is not viable, and the funding yield for an energy provider is not attractive.

My view at this moment - No technically suitable solutions are available in the market, costs are too great based on your research into the current existing performance of park homes (they are performing already at the much higher level of envelope U-Value than millions of properties in the UK).

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.