

## ECO4 Scoring Consultation: Part 2 Response

**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.**

Response: We agree with your proposed format for partial project scores and full project scores. We believe that the scores proposed and methodology of calculating the scores makes sense for the scheme. However, for ground source shared loop array DHS this will be dependent on how the pre and post SAP bands are allowed to be determined (please see response to Question 3 and Question 19 below). In addition, we believe that the park home scores should be kept separate, per measure type. We will comment on this element of the scoring methodology specifically in the park home question responses below.

**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.**

Response: yes we agree with this approach

**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.**

Response: we believe measures which cannot be calculated in rdSAP, such as DHS should use Full SAP (along with the proposed method for shared ground loop array) to calculate the pre and post SAP band. We have provided Ofgem with data and information on how to use full SAP for GSHP shared ground loop array DHS to calculate the correct pre and post full SAP band. This will ensure correct reporting of SAP band improvements and ensure the correct deemed scores are used. Without this methodology the correct SAP bands will not be determined and as evidenced to Ofgem will result in the measures not going ahead. Perhaps some flexibility in the definition of the use of full SAP to calculate SAP bands for DHS ground source shared loop array will allow for the correct SAP band to be determined.

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

Response: we do not agree with a combined park home insulation measure score because there is often cases where floors or roofs cannot be carried out or are not advised to be insulated. With a split score we are able to better meet PAS 2030, the document states its advised to insulate the whole property but incentivising it through a combined score could result in the home suffering with long term rot from the inside out. By splitting the score measures that can be done will be done and be appropriately addressed through the co-ordinator and system designer in any case.

**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?**

Response: we agree with keeping the distinction between single and double park homes.

**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.**

Response: whilst we agree with the approach used to derive the scores and the methodology for the DHS measure, it is only effective if we can correctly determine the pre and post SAP band. We have provided Ofgem with a process that can allow us to correctly determine the pre and post SAP band for GSHP shared ground loop array DHS using full SAP. Should we be able to use full SAP to do this in the way explained then we agree the scores and methods are correct and reflective of the improvements. Without this methodology the correct SAP bands will not be determined and as evidenced to Ofgem will result in the measures not going ahead. Perhaps some flexibility in the definition of the use of full SAP to calculate SAP bands for DHS ground source shared loop array will allow for the correct SAP band to be determined.