

Consultation Response – Ofgem ECO4 Scoring Consultation Part 2 BidConnector Limited

1.

Do you have any comments about the overall process of this consultation?

No

2.

Do you have any comments about its tone and content?

No

3.

Was it easy to read and understand? Or could it have been better written?

Yes however a full question list in one location would be useful.

4.

Were its conclusions balanced?

Yes

5.

Did it make reasoned recommendations for improvement?

Yes

6.

Any further comments?

No

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.

Whilst we agree that the format of the full project score is suitable, we have some reservations with regards to the partial project scores. We understand and agree with the objectives of the partial project score however we believe that it will cause additional burden on Ofgem and Energy Companies when compliance checking and banking measures. The additional burden will come in the form of linking multiple measures together and ensuring that they have been installed compliantly and meet all of the requirements of the full project. We also have concerns around the potential number of projects being downgraded from a full project score to partial project scores post notification and the additional administration this will cause.

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 – However notifying fixed value uplifts as measures will cause additional administrative burden across the entire ECO supply chain.

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.

Yes – This will encompass all changed to the SAP rating of the property and will be more accurate than a calculation based on the initial assessment.

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.

We both agree and disagree with this approach:

Agree – This will allow for measures to be notified as they are installed allowing administration workloads to be steady rather than having peaks and troughs. This will also allow installers to have a more steady cash flow.

Disagree – Notifying full projects in one submission will reduce the amount of administration required across the supply chain.

Disagree – When a full project is notified to TrustMark they will be able to instruct technical monitoring on all measures at once to reduce the number of post install visits to the property.

5.

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

Yes – Awarding the PPS to all measures in the project allows for more simple administration of any future withdrawals and down scores.

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.

Yes.

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. The only alternative could be to require a signed form from the Retrofit Coordinator however this increases administration requirements and cannot be independently verified.

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.

9.

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

With the addition of SAP data in the deemed scores matrix this will cover the wall type of the property and remove the need for this distinction within the matrix.

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?

Yes

11.

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

As discussed in point 9 above the use of SAP assessments will provide information and scoring implications for the condition of the property pre install. This will allow the distinction between pre existing and no pre existing heating controls to be removed.

12.

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

Yes. This information is already collected as part of the data not provided to Ofgem therefore this does not cause any additional work for the supply chain.

13.

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

We agree with this proposal as, as previously mentioned, this will be captured by the pre installation SAP assessment.

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 we agree with the reduction as this will provide further simplification of the deemed scores table.

15.

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

We agree with this proposal as the current process of scoring PHI as three separate measures will be made redundant by the requirement to install using a whole house approach.

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?

Whilst we do agree with this proposal we also believe that combining the two measures would be mitigated by the SAP assessment requirements.

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?

We agree with the addition of these measures.

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 would suggest not having a distinction for PRI between existing and no pre-existing insulation as it is extremely rare for there to be existing pitched roof insulation in place that would require topping up.

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 we agree.

