

Question	Answer
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
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. 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	<p>Our preference in scoring consultation 1 was to use calculated scores for the post retrofit finishing SAP rating. This remains our preference for the reasons stated in that response.</p> <p>However, it is good to note that should Ofgem choose a post install assessment, the intention is for Trustmark to develop an auditing regime comparing pre and post assessments. It is important that this auditing regime is trusted and comprehensive as well as being up and running as soon as installers can start lodging post install RdSAP assessments.</p> <p>The data captured in RdSAP assessments is comprehensive. It is imperative that Ofgem and Trustmark have a process established for dealing with mis-matches as EDF believe it possible that some of the underlying information could be different between the pre and post RdSAP assessment (with the exception of the measures installed which would be an expected difference.) In these scenarios where there are small differences it would be very helpful to understand Ofgem's view as to acceptable differences so there is confidence to award partial project scores and full project scores. The scenarios that EDF envisage are not data manipulation to increase the scores claimed but more small differences, where a manual process is undertaken by, potentially, two different people (unlikely to significantly impact the SAP rating but differences in the data sets nonetheless). EDF would be concerned if these outcomes are not envisaged and a process to resolve these should be established at the earliest opportunity.</p>

	<p>Suppliers should not be held accountable for validating these assessments if they are done by audited professionals. To do so would carry a lot of administrative burden and would duplicate work already carried out by certification bodies and/or Trustmark. It would require suppliers and Ofgem to develop software and understanding of how RdSAP assessments are put together in order to understand whether inputs are correct.</p> <p>Although this is more for BEIS, it would be good to know if costs been factored in for additional SAP assessments post install.</p>
<p>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</p>	<p>We do not agree. This adds more complexity.</p> <p>The proposed rationale of mirroring the relationship and sequencing of the project itself makes no difference to how measures will get notified to suppliers.</p> <p>Installers will not upload anything to a supplier until they want to get paid for it. Therefore, they will only be loading examples of what Ofgem state are part of a project notification at the point they have an install to send to a supplier in order to receive payment for it.</p> <p>Having separate project and measure notifications serves in doubling the amount of reporting a supplier must do. This would involve setting up two reporting extractions and processes instead of one, which seems unnecessary.</p> <p>Having one template would enable easier reconciliation of data than having to pull from two notification sources.</p> <p>In the spirit of the rest of consultation Ofgem should try and simplify where possible. Having one notification template would go some way to achieving this.</p> <p>Suppliers could populate or leave submission fields blank depending on where within a project an installed measure falls and a project would be deemed complete by a supplier once they have notified the Trustmark Project Completion Certificate ID, similarly to how ECO3 does since Trustmark's introduction to the scheme.</p>
<p>5. Do you agree with our proposal to award deflated PPS to the final measure in a project? If not, please suggest an alternative,</p>	<p>Yes. It would be more complicated to have deflated PPS for some measures and not others.</p>

6. Do you agree that in ECO4 we should continue to require supplier generated MRNs to for all measures?	yes
7. Do you agree with our proposals for determining the point of completion for the project?	yes
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?	Yes. The removal of fields that could be manipulated for scoring benefit.
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?	No.
12. Do you agree with the proposed changes to the notification of rare heating systems? If not, please provide alternative suggestions.	Yes, this is in line with the spirit of simplification where possible.

13. What are your views on our proposal to remove pre-main heat source for insulation measures?	EDF supports this decision. Falsification of pre-main heat sources accounts for a decent proportion of ECO3 fraud cases. If they do not need to be captured it is one less thing suppliers will need to build fraud detection processes against, which can be administratively heavy.
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.
15. What are your views on our proposal to have a combined park home insulation measure?	We support this decision, if it aligns with what installers must do in PAS and best practice guidance then it makes sense for ECO to follow suit.
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. However, with both archetypes likely to fall into the lowest floor area scoring bracket, having differing PPS may have an effect on incentivising one over the other in terms of delivery on the ground.
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?	The first two align with PAS standards so make sense. Scores are no different for hybrid and EWI/IWI but makes sense to have a distinction if Trustmark is going to have one.
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	Yes. It will be important to define what level of existing loft insulation present is acceptable for pitch roof insulation to be an acceptable measure. Whilst we would expect that improvements should be picked up by the RdSAP assessment it is likely that PRI and LI will be flagged as duplicates by Ofgem either within ECO4 or against previous schemes.
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