

Questions

Question 1: Do you agree that full project scores should be based on starting and finishing intermediate SAP bands?

Yes. It needs to have an incentive to target the full range of measures that are able to be installed in the house.

Question 2: Do you agree that scores should be segregated into four floor area segments?

Yes, we agree.

Question 3: Do you agree with the methodology used to determine the full project scores?

We do not fully understand how the <100% POPT scores will be calculated, will a % for each 10 be provided so we can see the total scores. We will need to see the heating scores as this will be the determining factor in whether we can reach the required EPC levels. Will ASHP have a high enough SAP score as it's an electric fuel source.

Question 4: Are you aware of any further advantages or disadvantages in respect of the options presented to determine the finishing SAP band?

Post EPC's would be helpful as it will create up to date EPC's that should help support duplicates being claimed. However, it does raise the issue of having a post epc score that does not match the full project score

Question 5: What are your views on the advantages and disadvantages identified?

The benefits and disadvantages raised accurately reflect the situation, it seems a 50/50 split on which would be better.

Question 6: Do you agree with the proposal to use pre-calculated deemed partial project scores based on the floor area, and starting intermediate SAP band?

The payments need to be made as the measures progress, with multiple measures there is a high investment cost for the installer, and they cannot wait for the end of the project for payment. It is a complex system, is there a simpler way for a utility company to make payment with low risk? The number of rejected measures is very low, at least for us, and we don't think that the system should be complicated by a relatively low issue that can occur.

Question 7: Do you agree with the process used to develop the partial project scores?

Yes

Question 8: Do you agree with the use of a single fixed correction factor to account for interactions between measures?

yes

Question 9: Do you agree with the use of the actual percentage of property treated to determine the partial project score for a measure?

We are not sure how this would work; would a score be created for every 10% of the FPS.

Question 10: Do you agree with our proposal to calculate the innovation measure uplift by using the partial project score for the innovation measure

Yes

Question 11: Do you agree with our proposal to have two routes for new measures to enter the ECO4 scheme – a standard alternative methodology route and a new “data light” route?

Yes

Question 12: Do you agree with our proposed evidence requirements for the data light route? If not, please inform us of your preferred requirements.

Yes

Question 13: Do you think we should have additional mechanisms, such as a review stage or an open call for evidence, to account for the inherent risk associated with data light scores

The revision of scores as stated would need to be for future measures and not retrospectively.