

## **ECO4 scoring consultation: part 2 Stroma Certification Ltd Response**

Stroma Certification Ltd are one of the biggest Certification Bodies in the UK. We have over 6,000 active members and cover all EPD strands, such as DEA, OCDEA and NDEA, as well as the TrustMark schemes of Retrofit Assessor and Coordinator under the PAS 2035 standard.

Stroma Certification welcomes this second opportunity to respond to questions set by OFGEM on the proposed ECO Scoring process for ECO 4.

We have been and remain strong supporters of the ECO scheme and enthused by the re-inclusion of EPCs and SAP/RdSAP methodologies within the scoring process.

Whilst our members and Stroma Certification itself is mostly unaffected by the proposals in the scoring methodology, there are a few key areas where RdSAP methodology calculations are proposed, and we have provided a response in each case.

In general terms, Stroma Certification firmly believes that pre and post EPCs are essential mechanisms that allow extra layers of quality assurance (given that we now have the capability to employ risk based (Smart Auditing) capabilities within the QA process. Their inclusion will also allow government and other key stakeholders to assess and measure improvement, ensure the nations registers are up to date, which is also useful for wider industry use such as lending and social housing organisations.

### **Questions**

**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.**

Yes, Stroma Certification agrees with the proposed format. The ability to claim for partial parts of a project is crucial to the whole house processes in ECO4 and it is key that credit given is correct and proportional to the whole.

**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.**

Stroma Certification is not able to comment here.

**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.**

Stroma Certification agreed absolutely. We would add that this should be in the form of a lodged EPC or at the very least, insist that the data is lodged with the certification body (often a report called an EPR). We also feel strongly that this should be the minimum

requirement within the process, and it would be better for both the pre and post RdSAP assessments to be lodged on the relevant EPC central register.

### **Lodging an EPC - rationale**

By lodging an EPC on the central register, the data is available to other stakeholders, therefore is subject to greater oversight, both by the government approved assessor scheme, who now have the capability to audit using smart/risk based rules – but also by other stakeholders. To aid the latter, the raw RdSAP data should be shareable within the ECO stakeholder chain, particularly with the Retrofit Coordinator, and this should be via XML or other suitable format (CSV etc).

The government should also work to speed up the publication of the Open Data, which currently takes up to 3/4 months to publish post-lodgement.

This would allow other, non-core stakeholders to have sight of the data, thus subjecting it to further scrutiny if necessary. The faster this can happen; the more benefit is derived from this process.

### **Lodging an EPR - rationale**

Unlike an EPC, and EPR is only lodged with the Scheme. It is therefore not subject to the additional central register fees that is applied to an EPC.

Other than that, the data and the process is the same. The scheme can see the data in its final form, it is given a report reference number, at which point it cannot be manipulated post lodgement. This gives the data and the resulting report a similar level of certainty and therefore, trust. XML data is available for portability and the data can be accessed via scheme software at any time.

The same conventions and methodology are applied and therefore can be subject to the same QA rigours as an EPC.

The data can also be easily copied and converted to an EPC is/where a lodged EPC is required thus saving time, effort, and cost.

**Question 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.**

Stroma Certification cannot answer this question.

**Question 5: Do you agree with our proposal to award deflated PPS to the final measure in a project? If not, please suggest an alternative.**

Stroma Certification cannot answer this question.

**Question 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.**

Stroma Certification cannot answer this question.

**Question 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?**

As per our answer to Question 2 – Stroma Certification strongly feels that the end point of the project should be a lodged EPC.

is that RdSAP data has a transaction type data point. This contains the transaction type of ECO. This effectively discloses and tags the purpose of the survey at the point it was required.

Stroma Certification recommends three things for OFGEM to consider, that will vastly benefit the ECO process if implemented, where an EPC or EPR are lodged.

- 1) Expand the transaction type list to Pre and Post ECO. The government and schemes can then understand the relationship and journey of the data, and this will benefit QA.
- 2) Irrespective of 1), ensure that all EPCs (or EPRs) lodged use the correct transaction type (For ECO) so that it is possible schemes and other governance to clearly see that a report has been produced for the ECO scheme. With this tag, schemes can design software to limit the use of unlikely and/or higher risk data points and invoke risk-based auditing for the scheme. This could be potentially within the earlier days of the scheme to evaluate the successful launch of the scheme and protect the EPC as a product.
- 3) Ensure the assessor who completed the pre-assessment is also responsible for lodging the post-ECO EPC.

**Question 8: Do you agree with the assumptions used to develop the partial project scores? If not, please suggest where the assumptions should be changed.**

Stroma Certification cannot answer this question.

**Question 9: What are your views on our proposal to remove the wall type distinction for heating measures?**

Stroma Certification cannot answer this question.

**Question 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?**

Stroma Certification cannot answer this question.

**Question 11: Do you have any suggestions on how heating control measure category could be further simplified?**

Stroma Certification cannot answer this question.

**Question 12: Do you agree with the proposed changes to the notification of rare heating systems? If not, please provide alternative suggestions.**

Stroma Certification cannot answer this question.

**Question 13: What are your views on our proposal to remove pre-main heat source for insulation measures?**

Stroma Certification cannot answer this question.

**Question 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.**

Stroma Certification fully agrees with this. IN any case, all bespoke u-values used should be done so in accordance with correct u-value conventions and done so by a suitably qualified and competent person (OCDEA, NDEA L4 etc). The calculation should be specific to the property, dated, broken down into the component materials within the element and the professional who produced the report, along with the software used should be disclosed on the calculation out put report.

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

Stroma Certification cannot answer this question.

**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?**

Stroma Certification cannot answer this question.

**Question 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?**

Stroma Certification agrees with this approach.

**Question 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.**

Stroma Certification cannot answer this question.

**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.**

Stroma Certification cannot answer this question.