

YES Energy Solutions Consultation 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.

No we think that this is over complicating it and it should stay as it is in ECO3 as a set score for each measure which covers the funding for the measure, with a potential uplift applied to incentivise doing a whole house approach. The current proposal will cause issues with administration and finances for the supply chain.

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.

Under the current proposal we think uplifts should be included within the scoring matrix, however as mentioned above we think the scoring should stay the same as it is for ECO3 in which case we would say that the uplift is incorporated in the same way it is now under ECO3.

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.

Based on the current proposal we do agree, however we have concerns about RdSAP and its accuracy at this moment in time and this would need to be taken into consideration.

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.

As stated above we do not think the scoring should be based on projects however if this is the stance which is taken then we think that there should be separate measure and project notifications as it will cause complications to the submission process if we have to provide completed project information within the final measure and it's likely that things will be missed in error. If the project completion is a separate measure in itself it removes that risk.

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.

Yes we agree with this, it will make it simpler to calculate when the scores get upgraded from PPS to FPS if all measures have had a PPS assigned against them.

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.

Yes we agree with this. As a managing agent we rely heavily on the MRNs to liaise with the supply chain while protecting GDPR. We also do not have visibility of our installer partners Trustmark accounts which means if a lodgement is superseded and the UMR changes then we may not be aware which could cause issues and delays with any queries raised later down the line.

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?

No we do not want this to be determined via Trustmark because we do not want to rely on them for more than we already do, when we are already seeing a number of issues and long delays for the things already done through Trustmark in ECO3.

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.

No comments.

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

We agree with this. We currently see a lot of administration errors surrounding wall types which would be removed if this was already covered in the SAP ratings.

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?

Yes we agree with simplifying it in this way.

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

We think that current additional control measures such as load compensation and weather comp should not be their own measure and the scores currently awarded should be incorporated within the new P&RT scores as installers have to ensure their P&RT meet boiler plus regulations which means ensuring one of these is installed alongside it anyway.

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

Yes we agree.

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

We agree with the proposal as this is incorporated into the SAP bands.

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.

Yes we agree.

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

We think that this should be returned back to how it originally was and the PAS should be amended to allow individual park home measures rather than combined.

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?

Yes we agree.

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?

No comments.

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.

No comments.

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.

No comments.