

ECO4 scoring methodology: part 1

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Response from Pacifica Home Services –

We are an ECO installer of both heating and insulation measures and have been involved with ECO since inception in 2013.

Erik Coates – Energy Services Director, erik.coates@pacificagroup.co.uk

Generally we believe the approach to scoring is far too complex and fraught with problems but we have fed this back as part of the ECO4 consultation to BEIS

2. Full project scores

Questions

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

In the absence of accurate SAP software which calculates renewable technologies accurately Yes – but scores in examples seems to be limited what are the scores for ASHP hybrid systems, and replacing inefficient gas/oil boilers with ASHP.

ASHP controls are not considered

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

Yes

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

No – its too complicated, in absence of updated SAP software, we should stick to measure specific scores, remove PPS and deflated scores and apply bonus for more measures fitted

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

Without seeing the proposed scores no,

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

I agree it will give false SAP scores for property and can risk of abuse as scores can be manipulated. EPC's are notoriously inaccurate, depending on why the original EPC was carried out eg higher for house moves and lower for measure schemes.

I don't see we have much choice as upgrading SAP is likely to be a long time away

3. Partial project scores

Questions

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?

No the process is too complicated. Measures should be paid at the going rate and bonuses to incentivize more measures.

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

No – I think proposed scoring is far too complex – and will lead to inflated PPS to avoid risk, far better have true base scores and bonus uplifts for completion of project. Carrot rather than stick.

Many of deflated scenarios will be outside of installers control, customer cancellation, customer died moved, PAS changes a la IWI and 100% of measure required.

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

No

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

I agree POPT should be used but don't agree with partial scores

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 – if innovation is required.

4. Alternative methodology

Questions

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?

I don't agree innovation should be tested on the fuel poor. But if it is required Yes – but it will be open to mis use by manufacturers as they generally all claim more savings than reasonable (ala car fuel emission and milage rates)

The track record of innovation on eco is poor, 0.46% has been carried out under ECO3 and of the measures approved most are unsuitable for ECO either too expensive or not suitable or attractive to customers. e.g. Radbot cost £25 to £30 per unit, around £400 per property but deemed score will cover about 1/3 of cost even with uplift. Q bot is far too expensive to buy equipment, limited application and large customer contributions.

There is no redress fund for measure that fail to perform to be removed.

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 but as noted in Q11 it will be very difficult to substantiate manufactures claims, they are good at producing marketing claims which are difficult to dis-prove and Ofgem panel is unlikely to have the expertise to challenge, hence the track record of products approved by the panel has been so poor in reality.

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?

No As noted above – innovation has not proved successful on ECO if we find measures are not performing what does the scheme intend to do, claw back the money from the installer? Or ask the manufacture to remove and replace the measure.