

Dear Ofgem,

**Bulb response to Energy Company Obligation (ECO4) Consultation: scoring methodology - part 1**

In general, Bulb supports the proposals put forward by Ofgem for how scoring should be done in ECO4.

We have slight concerns around the proposed floor area bands could lead to gaming by installers, using the 10%  $\pm$  deviation in floor area that is allowed by Ofgem.

We also believe that it's important that customers understand the changes to their home's efficiency rating.

You can find our full response in the appendix at the bottom of this email.

If you have any questions about this response, please contact Scott Clothier ([scott@bulb.co.uk](mailto:scott@bulb.co.uk)).

Please note that our consultation response can be published.

Best regards

Scott Clothier  
ECO Operations Manager

**Appendix - Bulb response to consultation questions**

**Question 2:**

We agree that scores should be based on floor area bands but are concerned that the lower end of the proposed 98-200m<sup>2</sup> segment appears to be relatively close to the average house size (85m<sup>2</sup>). Ideally, the segments would be structured so as to minimise the number of properties close to the dividing line between segments. In properties close to the dividing line there is an incentive to inflate the floor area, and since Ofgem allows a 10% deviation in floor area, this would be possible without breaking any guidelines.

**Question 3:**

In regards to the scoring methods being considered, Bulb believes that regardless of which scoring method is ultimately used, the customer should be adequately informed as to the energy efficiency of their property post-installation. In particular the customer should be aware of the new EPC rating of their property, which would most likely involve a post-install EPC assessment.

In regards to pre-calculated scoring methods, Bulb believes that pre-calculated scores should be adjusted over the course of the scheme as Ofgem receives data on the performance of particular measures. In order to facilitate this, Ofgem should consider establishing methods for suppliers to provide data, such as a regular call for evidence.

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