

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

We agree provided the SAP band can be determined through rdSAP or full SAP. For complex measures like DHS the underlying SAP values should be used and adjusted with appropriate COPs and efficiencies per technology type. This is a simple and effective way to still use the same deemed score approach using floor area and pre and post SAP ratings as the rest of the measures. This will allow for the correct pre and post SAP rating to be determined to therefore use the correct deemed score.

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

We agree with this approach it simplifies the process

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

We would like to suggest on how to calculate the full project scores for DHS and therefore the PPS follows suit with the percentage decreases. DHS deemed scores should be calculated based on the specific technology type. Using the spreadsheet developed and given to Ofgem, a full pre and post SAP should be calculated based on the technology type and floor area. Figures from the full SAPs should be input into the calculator to generate the deemed scores.

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

We agree with the methodology of using either rdSAP, full SAP or the single score calculations. However, we believe that there is a disadvantage in that the full SAP option for DHS should allow us to correctly calculate the pre and post deemed scores as mentioned above using correct COPs and efficiencies and fuel prices. This will also affect the SAP rating. So provided the calculation of the pre and post SAP rating can be done using full SAP and the spreadsheet then the disadvantage goes away.

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

Whilst there are advantages and disadvantages, we agree that provided the installer can determine the pre and post SAP bands using either a rdSAP full SAP or the Ofgem methodology then this is a fair option especially considering each option has both advantages and disadvantages. In addition, depending on the measure there are different requirements within MCS or PAS so by allowing any of these methodologies to determine SAP bands we can decrease complexity and costs to the delivery of the scheme, e.g., MCS requires us to carry out full pre and post SAP assessments.

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?

We agree please see answer to question 3 on how FPS can be calculated for DHS and the associated PPS.

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

We agree with the process however we have voiced to BEIS that the deflator percentage suggested of 30-40% is too high. In addition, with a correction factor percentage this is almost a deflation of 40-50% which wouldn't even cover the cost of the install. It will be difficult for business to cash flow based on 3 months delivery time plus payment terms.

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

We agree provided the deflator percentage is reduced to around 10-15%, subject to BEIS decision.

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 agree with this approach

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

We agree with this process

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?

We believe the methodology of assessment should be kept in the hands of the BRE rather than Tap and that with this there should be the option of submitting a new measure methodology at any time rather than quarterly. We found in ECO3 that the process takes too much time when having quarterly meetings. Whereas when using BRE in the past the process was not restricted to quarterly submissions and due to their vast experience across technologies, it meant that they were able to assess the proposals across the board. Whereas Tap has admitted on several occasions that they did not have relevant expertise in some technologies after assessing proposals for several months.

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

We agree once again provided the BRE can be scientific arm for the assessment given their expertise.

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?

We do not believe that this is necessary however we do believe that the process should include a presentation of the data and technology to Ofgem. This way the technology can be understood easily. This process of a meeting was very successful during CERT and CESP because the technical team was able to understand the technology and ask questions. Then when reading the data and proposal a lot of the simple questions were eliminated. It proved to be a very efficient process. In addition, when backed up with the BREs understanding of the technological description, the process was very efficient.