

## Partial Project Scoring & Overarching Approach

1. **Do you agree with our proposed format for partial project and full project scores?**

Yes, we agree with this proposal.

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?**

Yes, we agree with this proposal.

## Determining the finishing SAP rating

3. **Do you agree with our proposal to require a post-retrofit RdSAP assessment to determine a project's finishing SAP rating (option 1)?**

Yes - Option 1 is preferred as it can provide the householder with an updated SAP/RdSAP assessment at the end of the project, is more certain, and is less likely to be inaccurate compared to a generalised calculation method (option 2). Option 2's only merit is speed and efficiency, forsaking certainty and accuracy.

It does make it more difficult if measures are rejected after the fact, but we think the proposed solution to this to ensure a new SAP/RdSAP assessment is not required, is suitable.

We do believe that it should be clear in the guidance that installers need to have a lodged SAP/RdSAP assessment, i.e. it has an EPC RRN, and can be viewed on the EPC website.

## Notification in ECO4

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.**

We feel that multiple notifications will make it more complex, however, we understand that it's Ofgem's opinion that this would be easier for it to handle the data, and so we can support this proposal.

5. **Do you agree with our proposal to award deflated PPS to the final measure in a project?**

Yes we agree with this proposal.

6. **Do you agree that in ECO4 we should continue to require supplier generated MRNs for all measures?**

Yes, supplier generated MRNs should continue in ECO4.

- 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?**

Both options seem feasible. It could also be possible to use the Project Completion Certificate ID to determine the point of completion for the project.

## **Updates to existing ECO measures**

- 8. Do you agree with the assumptions used to develop the partial project scores?**

Yes we agree with this proposal.

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

As SAP already factors it into its calculations then we agree it can be removed to make it simpler.

- 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?**

We agree with this proposal for standard controls. However, we do not agree with the proposal to remove 'smarththerm\_noP&RT' as this ultimately goes away from the simplification of heating controls Ofgem was trying to get to breaking out the standard control measures.

- 11. Do you have any suggestions on how the heating control measure category could be further simplified?**

The only way to simplify this would be to have a specific measure type for each combination of what was there pre-install and what is there post-install e.g. Smarttherm\_nopreTRV, Heating\_controls\_nopreTRV\_Comp, Heating\_controls\_preTRV\_noComp

- 12. Do you agree with the proposed changes to the notification of rare heating systems?**

We agree with this proposal.

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

As SAP already factors it into its calculations then we agree it can be removed to make it simpler.

- 14. Do you agree that the number of u-value variants for solid wall insulation measures should be reduced?**

We agree with this proposal.

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

We agree with this proposal.

**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?**

We agree with this proposal.

**New measures added for ECO4**

**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?**

We support the addition of these measures to the scheme.

Loft insulation and PRI have separate annexes with differing competency requirements and PRI also has different technical monitoring requirements compared to loft insulation so it makes sense to separate them. The addition of DHS Non-CHP and CHP seems more accurate when sorting PPS.

**18. Do you agree with the approach and assumptions used to derive the scores for the pitched roof insulation measure?**

We do not have an opinion.

**19. Do you agree with the approach and assumptions used to derive the scores for the district heating system connection measure?**

We do not have an opinion.